



## **Submission of SAFE: Proposed regulations for managing high pathogenicity avian influenza for farmed hens and chickens**

**To: Ministry for Primary Industries**  
**31 October 2025**



**SAFE wishes to be heard in support of this submission.**

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## About SAFE

SAFE (Save Animals from Exploitation) is New Zealand's leading animal rights organisation. Our goal is to inspire institutional, political, and societal shifts that reduce animals' suffering, improve their lives, and ultimately, end their exploitation. SAFE represents the views of tens of thousands of New Zealanders who support stronger protections for animals.

## Executive summary

Hens and chickens are sensitive, complex animals with unique personalities and preferences. They are legally recognised as sentient beings under the Animal Welfare Act 1999, reflecting the fact they have the capacity to experience emotions, feelings, and perceptions that matter to them. Sentience includes both negative experiences (such as pain or boredom) and positive experiences (such as comfort and pleasure). Despite this recognition, layer hens and chickens bred for meat endure lives of severe suffering within intensive factory farming systems.

The Animal Welfare Act places a duty of care on those responsible for these animals to meet their physical, health, and behavioural needs – however current factory farming practices fail to uphold these obligations. Chickens and hens are confined in overcrowded, barren environments that prevent them from expressing natural behaviours, causing immense physical and psychological harm.

The proposed regulations reflect the broader issue of industrialised farming systems that prioritise profit over welfare. SAFE advocates for an end to the cruel confinement of animals in all forms of intensive factory farming and urges the Ministry for Primary Industries (MPI) to uphold the principles of the Animal Welfare Act and take decisive action to transition toward farming systems that respect the sentience and dignity of all animals, whilst simultaneously reducing the spread and impacts of disease outbreaks – such as high pathogenicity avian influenza.

## 1. Recommendations

SAFE recommends MPI:

1. Does not proceed with the proposed regulations for managing high pathogenicity avian influenza.
2. Focuses on implementing strategies to transition the farming industry away from intensive factory farming systems, thereby mitigating the capacity for the spread of disease.
3. Ensures any future legislation does not undermine the animal's legal protections.

## 2. Background

The spread of high pathogenicity avian influenza (HPAI) among farmed chickens and other farmed bird species is accelerating globally at an alarming rate.

Whilst HPAI poses a serious threat to the health and welfare of farmed birds, its devastating impacts are one of many negative consequences of intensive farming methods. Overcrowding, genetic uniformity, and stressful, unhygienic conditions significantly compromise chickens' welfare and create prime conditions for the rapid spread of disease.

Introducing a management strategy focusing solely on responding to diseases such as avian influenza without addressing the myriad issues relating to intensive farming practices enabling their rapid transmission is irresponsible and short-sighted. Factory farming is not only unethical and unsustainable, by design it this structure facilitates the emergence and spread of diseases.

The proposed regulations provide only loose guidelines for commercial chicken farmers and would allow individual farms to carry out the slaughter of chickens infected with HPAI broadly at their discretion – an approach that risks systemic breaches of our animal welfare legislation.

The Animal Welfare Act sets out the obligations of animal owners or people in charge of animals. Under the Act, persons responsible for animals are required to meet their physical, health, and behavioural needs, and alleviate pain or distress. Animals must be protected from disease and have the opportunity to 'display normal patterns of behaviour'. The welfare of animals must be the foundation of any biosecurity or disease management strategy. As such, it is vital the government take leadership and address the underlying causes of intensively farmed bird disease out-breaks amongst intensively farmed birds, focusing on creating a management strategy that acknowledges birds as sentient beings, rather than as disposable commodities.

Rather than preparing for large-scale killing operations, effective management should focus on disease prevention by phasing out intensive factory farming. Removing chickens from overcrowded, filthy, and stressful environments where disease spreads rapidly is an essential management tool to preventing and managing future outbreaks.

### 3. Factory farming contributors to the spread of HPAI

#### Intensive confinement

With over 120 million chickens farmed for their meat in 2024 alone,<sup>1</sup> New Zealand slaughters over 333,000 chickens a day. In addition, around four million hens are farmed annually for egg production. The majority of these birds are raised on highly intensive factory farms, where tens of thousands of animals are confined to one shed.

Under both the Code of Welfare for Meat Chickens and the Code of Welfare for Layer Hens, there is no established maximum number of birds permitted in a single shed. Instead, the codes provide guidelines on how many animals can be contained per square metre. With regard to chickens bred for meat, the minimum requirement allows up to 38kg of 'live weight' per square metre of floor space<sup>2</sup>. For hens farmed for their eggs, the minimum requirement allows seven hens per square metre within indoor barn systems and nine hens per square metre within barns with outdoor access. Colony cage systems are permitted to crowd up to 80 hens into one cage, with the code allowing hens an individual living space of 750cm<sup>2</sup> – about the size of an A4 sheet of paper.

These overcrowded living conditions are typically unsanitary and contaminated with excrement, further diminishing the birds' quality of life and elevating the risk of disease and injury. Additionally, intensive confinement is proven to cause numerous negative health and welfare impacts, including increased stress<sup>3</sup>, weakened immune systems, respiratory problems from poor air quality,<sup>4</sup> injuries and infections such as hock burn<sup>5</sup>, and a higher incidence of harm from pecking and aggressive behaviors<sup>6</sup>. A lack of properly functioning immune system makes these birds susceptible to disease and illness, which increases the risk of contracting and spreading diseases such as HPAI.

Overcrowded conditions in factory farming systems are known to cause the rapid spread of disease; intensive chicken farming is one of the leading causes of the spread of zoonotic diseases globally, and the number one spreader of campylobacter disease in New Zealand.<sup>7</sup>

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<sup>1</sup> Figure NZ. (2024). *Meat chickens processed in New Zealand*. Accessed 24 September 2025.

<https://figure.nz/chart/QzXp9lsqIAJr9v1x>

<sup>2</sup> Code of Welfare: Meat Chickens. (2018). MPI. <https://www.mpi.govt.nz/dmsdocument/46042-Code-of-Welfare-Meat-chickens/>

<sup>3</sup> DeGrazia, D. "The Ethics of Confining Animals: From Farms to Zoos to Human Homes". *The Oxford Handbook of Animal Ethics*, 738-768. <https://doi.org/10.1093/oxfordhb/9780195371963.013.0028>

<sup>4</sup> Howell, M. (2019). "The Chicken Whisperer: tackling ammonia levels in backyard flocks". *The Poultry Site*. Accessed 28 October 2025, <https://www.thepoultrysite.com/articles/the-chicken-whisperer-tackling-ammonia-levels-in-backyard-flocks/p2>

<sup>5</sup> European Food Safety Authority. "The welfare aspects of various systems of keeping laying hens." *The EFSA Journal* 197, (2005). 1-23. <https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2005.197>

<sup>6</sup> Fijn, L., Josef van der Staay, F., Goerlich-Jansson, V., Arndt, S. "Importance of Basic Research on the Causes of Feather Pecking in Relation to Welfare". *Animals (Basel)*. 10, no.2. 1-14. (2020). DOI: <https://doi.org/10.3390/ani10020213>

<sup>7</sup> Baker, M. et al. (2025). *Prolonged campylobacter epidemic chicken meat needs strong industry and regulatory response*. PHCC. <https://www.phcc.org.nz/briefing/prolonged-campylobacter-epidemic-chicken-meat-needs-strong-industry-and-regulatory#:~:text=In%20Aotearoa%20New%20Zealand%20%28NZ%29%2C%20contaminated%20fresh%20>

By continuing to intensively farm hens and chickens, the rapid transmission of disease is inevitable, regardless of any proposed management system.

### Intensive farming

The intensive farming of layer hens and chickens bred for meat is fundamentally incompatible with their health and welfare needs, resulting in birds that are more likely to have compromised immune systems and are therefore highly vulnerable to disease<sup>8</sup>.

The altered, unnaturally rapid growth of chickens bred for meat, and the intensified egg production in layer hens, results in a significant decline in overall health. When bred in intensive factory farming conditions, chickens bred for meat become highly susceptible to viral infections due to compromised immune systems and inadequate nutrient levels – the rapid growth rate resulting from selective breeding taking a significant toll on their physical health. Their bodies often become too heavy for their underdeveloped legs to support, making it difficult or even impossible to reach food and water and leading to starvation and dehydration.<sup>9</sup> Fatty liver disease<sup>10</sup> and cardiovascular issues further compromise the health of these birds, and with vital nutrients diverted to deal with these issues immunosuppression is an ongoing issue.<sup>11</sup>

For layer hens, the overproduction of eggs can lead to constant depletion of calcium reserves required for shell formation, resulting in bone fragility, osteoporosis, and a condition known as 'layer fatigue'. In severe cases, this can cause spinal cord exposure or even paralysis.<sup>12</sup>

Through the review of the 2011 Code of Welfare for Meat Chickens, MPI acknowledges the concerns associated with breeding 'flawed' chickens:

*"The industry needs to take steps to ensure these trends do not create future welfare problems that will not be ethically acceptable to New Zealander's".<sup>13</sup>*

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[0chicken, and sometimes%20fatal%2C%20neurological%20condition%20Guillain-Barr%C3%A9%20syndrome%20%28GBS%29.4](#)

<sup>8</sup> Hu, W. et al. (2024). "Molecular and metabolic response to immune stress in the jejunum of broiler chickens: transcriptomic and metabolomic analysis. Poultry Science, 103(5).

<https://doi.org/10.1016/j.psj.2024.103621>

<sup>9</sup> Nicol, C.J. et al., (2017). Farmed Bird Welfare Science Review. *Agriculture Victoria*, p 1-321.

<https://agriculture.vic.gov.au/livestock-and-animals/animal-welfare-victoria/livestock-management-and-welfare/farmed-bird-welfare-science-review/Farmed-Bird-Welfare-Science-Review.pdf>

<sup>10</sup> Imtiaz, A. et al. (2025). *Non-Alcoholic Fatty Liver Disease in Poultry: Risk Factors, Mechanism of Development, and Emerging Strategies*. Int. J. Mol. Sci., 26(17). <https://doi.org/10.3390/ijms26178460>

<sup>11</sup> Olkowski, A. A. (2007). *Pathophysiology of Heart Failure in Broiler Chickens: Structural, Biochemical, and Molecular Characteristics*. Poultry Science, 86(5), 999-1005. <https://doi.org/10.1093/ps/86.5.999>

<sup>12</sup> Jendral et al. (2008). *Bone Mineral Density and Breaking Strength of White Leghorns Housed in Conventional, Modified, and Commercially Available Colony Battery Cages*. Poultry Science, 87(5), pp 828-837. <https://doi.org/10.3382/ps.2007-00192>

<sup>13</sup> NAWAC. (2011). *Animal Welfare (Meat Chickens) Code of Welfare Report*. MPI.

<https://www.mpi.govt.nz/dmsdocument/46117-Meat-Chickens-Animal-Welfare-Code-of-Welfare-2012-Review-of-Submissions-and-Update/#:~:text=NAWAC%20acknowledges%20the%20need%20for,Lardner%20and%20Clasen%2C%20010.>

## Living conditions

Farmed chickens are often kept in filthy, overcrowded, unhygienic environments, forced to live in their own excrement and suffering the resulting health impacts. Litter on the shed floor is typically not changed during the birds' lifetime. As a result, they spend their entire lives standing and resting not only in their own excrement (but also the excrement of thousands of other birds) until being sent for slaughter. This is particularly harmful for chickens bred for meat who are selectively bred to grow so rapidly that they struggle to stand or walk for extended periods. Consequently, they spend prolonged time lying in soiled litter, which increases their exposure to infection and disease.

According to the Code of Welfare for Meat Chickens, replacing soiled litter between flocks is only listed as a “*recommended best practice*” rather than a mandatory requirement.<sup>14</sup> Similarly for layer hens housed in both indoor-only and free-range barn systems, the Code of Welfare for Layer Hens lists the complete removal and cleaning of litter between flocks as a “*recommended best practice*”, not a requirement.<sup>15</sup> With regards to colony cage systems, the code does not provide specific guidance relating to managing cage hygiene.

Accumulated faecal matter produces ammonia, which pollutes the air<sup>16</sup> and a burning sensation in the eyes, respiratory distress, and discomfort. The dampness of soiled litter contributes to foot diseases and footpad dermatitis leading to difficulty walking, severe pain, infection, and lameness.

While chickens' immune systems are forcibly preoccupied with fighting these preventable health issues, their overall immunity becomes compromised leaving them more vulnerable to disease. This weakened immune response increases the risk of HPAI spreading amongst flocks, as their bodies have a reduced capacity to fight off viruses while combating the illnesses and infections so common in this industry.

## Stress and inability to exhibit natural behaviours

Overcrowding, mutilation, and intensive farming conditions prevent chickens from expressing natural behaviours essential to their physical and psychological wellbeing. Behaviours such as wing stretching, foraging, dustbathing, nest building, perching, scratching, digging, and sun-basking are severely restricted in most intensive farming environments.<sup>17</sup>

Birds confined to indoor-only barns and cages are unable to forage for food, sun bask, or engage in normal exploratory behaviour. Layer hens bred to produce eggs confined in cages are even more constrained – unable to move freely, stretch their wings, dustbathe, or build nests. Chickens bred for

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<sup>14</sup> Code of Welfare: Meat Chickens. (2018). *MPI*. <https://www.mpi.govt.nz/dmsdocument/46042-Code-of-Welfare-Meat-chickens/>

<sup>15</sup> Code of Welfare: Layer Hens. (2018). *MPI*. <https://www.mpi.govt.nz/dmsdocument/46036-Code-of-Welfare-Layer-hens/>

<sup>16</sup> Sheikh, IU., et al. (2018). *Ammonia production in the poultry houses and its harmful effects*. International Journal of Veterinary Sciences and Animal Husbandry, 3(4), pp. 30-33.

<https://www.veterinarpaper.com/pdf/2018/vol3issue4/PartA/3-4-14-175.pdf>

<sup>17</sup> DeGrazia, D. (2012). *The Ethics of Confining Animals: From Farms to Zoos to Human Homes*. The Oxford Handbook of Animal Ethics, pp. 738-768.

<https://doi.org/10.1093/oxfordhb/9780195371963.013.0028>

meat grow so rapidly and unnaturally large, they often struggle to perform the most basic of normal behaviour such as standing or walking for extended periods.

The inability to perform natural behaviours can lead to psychological issues, such as frustration, boredom, and the development of maladaptive and aggressive behaviours including pecking and feather pulling.<sup>18</sup> In an attempt to reduce the severity of pecking injuries, up to 25% of chickens' beaks are partially amputated without anesthetic or post-procedural pain relief<sup>19</sup> by the egg industry. Beaks are highly sensitive organs, and this procedure causes extreme distress and pain, and can result in lifelong complications.<sup>20</sup>

Boredom, aggression, frustration and distress are linked to the increase in corticosterone levels in chickens.<sup>21</sup> High stress levels compromise animal welfare and can suppress immune functions due to hormone imbalances.<sup>22</sup> Additionally, aggressive behaviours, even with only a partial beak, result in lesions that can become easily infected in dirty living conditions.<sup>23</sup>

#### 4. Public opposition to factory farming

The harm caused by factory farming systems to animals is already a concern for the public. Polling has consistently shown that New Zealander's care about animal welfare, the living standards of animals, and preventing suffering.

Most recently, 2025 polling shows that 98% of New Zealander's believe it's important to protect animals from cruelty and neglect. In terms of legislation, less than 50% of New Zealander's believe that the requirements of the Animal Welfare Act are being upheld most of or all of the time, and 85% are concerned about the requirement not always being upheld.<sup>24</sup> By creating regulations that continue to undermine the basic requirements of the Animal Welfare Act, the government amplifies the narrative that animal welfare is not at the forefront of decision making. Additionally, polling indicates 78% of New Zealander's are concerned that farmed animals experience suffering due to poor living conditions and/or lack of proper care.<sup>25</sup>

It is clear that New Zealander's are concerned about the standard of living amongst farmed animals and are aware of how poor life quality can cause suffering. Continuing to keep chickens under these

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<sup>18</sup> Fijn, L., Josef van der Staay, F., Goerlich-Jansson, V., Arndt, S. "Importance of Basic Research on the Causes of Feather Pecking in Relation to Welfare". *Animals* (Basel). 10, no.2. 1-14. (2020). DOI: <https://doi.org/10.3390/ani10020213>

<sup>19</sup> Ministry of Primary Industries. (2018). "Painful Husbandry Procedures". Accessed 28 November 2025. <https://www.mpi.govt.nz/dmsdocument/46045-Code-of-Welfare-Painful-husbandry-procedures>

<sup>20</sup> European Food Safety Authority. "The welfare aspects of various systems of keeping laying hens." *The EFSA Journal* 197, (2005). 1-23. <https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2005.197>

<sup>21</sup> Scanes, C.G. (2016). *Biology of stress in poultry with emphasis on glucocorticoids and the heterophil to lymphocyte ratio*. *Poultry Science*, 95(9), pp. 2208-2215. <https://doi.org/10.3382/ps/pew137>

<sup>22</sup> Niu, X., et al. (2022). *Effect of Immune Stress on Growth Performance and Immune Functions of Livestock: Mechanisms and Prevention*. *Animals*, 12(7). <https://doi.org/10.3390/ani12070909>

<sup>23</sup> Fijn et al. (2020). *Importance of Basic Research on the Causes of Feather Pecking in Relation to Welfare*. *Animals* (Basel), 10(2), pp. 1-14. <https://doi.org/10.3390/ani10020213>

<sup>24</sup> Verian. (2025). "SAFE Public Perceptions Research Report".

<sup>25</sup> Verian. (2025). "SAFE Public Perceptions Research Report".

conditions and refusing to provide adequate prevention tactics to stop the spread of diseases such as HPAI is a contradictory effort that ignores New Zealander's concerns for the welfare of animal.

The sentiment that New Zealand should be protecting animals and providing them with a good quality of life has been prevalent in New Zealand for many years; it's time for government policy to reflect this viewpoint, rather than continuing with farming practices and strategies that consistently cause cruelty and suffering.

## 5. Culling as a management technique

### The Hillgrove Farm case

The spread of HPAI in Otago's Mainland Poultry Hillgrove Farm resulted in the mass slaughter of 200,000 chickens who were housed in five barns.<sup>26</sup> This case directly reflects the issue of intensively confining animals and highlights the inherent risks of intensively confining animals in overcrowded sheds, cages, or facilities, where cramped conditions enable the rapid spread of disease. As it is not possible to accurately keep track of symptoms of disease everyday amongst tens of thousands of animals, the Otago case clearly emphasizes the myriad issues associated with confining farmed animals in large numbers.

This case underscores how easily the animal production industry chooses convenience over welfare, and how little has been learned from past mistakes. By continuing to allow farms to overcrowd birds in intensive factory systems, disease outbreaks become inevitable. Killing hundreds of thousands of animals due to an outbreak of disease is ineffective, as it fails to address the underlying conditions that allow disease to spread.

### CO<sub>2</sub> poisoning

Poisoning animals to death via with CO<sub>2</sub> exposure is in no sense a humane method of euthanasia. Research shows this method of killing an animal causes severe distress including fear, anxiety, pain, and 'air hunger' (suffocation).<sup>27</sup> Animals exposed to this method often vocalise in panic and display frantic escape behaviours – clear signs of a highly traumatic death.<sup>28</sup> While MPI described CO<sub>2</sub> gassing as the "humane" culling option<sup>29</sup>, this terminology reflects a perceived practicality rather than compassion; death by CO<sub>2</sub> gas enables the rapid killing of large numbers of animals, not a humane or painless death.

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<sup>26</sup> Herbert, D. (2024). *Farms linked to Mainland Poultry Hillgrove site free of bird flu: MPI*. The Post. <https://www.thepost.co.nz/nz-news/360533390/farms-linked-mainland-poultry-hillgrove-site-free-bird-flu-mpi#:~:text=An%20Otago%20free-range%20farm%20that%20became%20infected%20with,culled%20after%20the%20H-7-N-6%20strain%20was%20found%20there>

<sup>27</sup> Steiner, A., et al. (2019). "Humanely Ending the Life of Animals: Research Priorities to Identify Alternatives to Carbon Dioxide". *Animals*, 9(11). <https://doi.org/10.3390/ani9110911>

<sup>28</sup> Llonch, P., Dalmau, A., Rodríguez, P., Manteca, X., Velarde, A. (2012). "Aversion to nitrogen and carbon dioxide mixtures for stunning pigs". *Animal Welfare*, 21(1), <https://doi.org/10.7120/096272812799129475>

<sup>29</sup> Anderson, R. (2024). "How humane is the gas plan for culling 80,000 chickens?". *Stuff*. Accessed 28 November 2025. <https://www.stuff.co.nz/nz-news/360509229/how-humane-gas-plan-culling-80000-chickens>

As outlined in Animal Welfare Act, it is an offence to kill an animal in a manner that causes unreasonable or unnecessary pain or distress. It is therefore our position that the suffering caused by CO<sub>2</sub> poisoning clearly meets this threshold and therefore constitutes unreasonable suffering. CO<sub>2</sub> poisoning is not only an unacceptable way for a chicken (or any living being) to die – it has no place in any responsible or humane bird flu management strategy.

## 6. Government funded slaughter

On 28 August 2025 the Coalition Government announced MPI would be assisting the funding of to fund the responses to HPAI. This deal struck with the Egg Producers Federation and the Poultry Industry Association of New Zealand would see MPI paying over 50% in some instances for the management of HPAI.<sup>30</sup> As reflected in MPI's current proposal, the suggestion of culling and disposal of chickens infected with HPAI is one of the key management suggestions; however Section 7 of the proposal states that MPI will minimise the cost to taxpayers to implement these strategies.<sup>31</sup>

The outbreak of HPAI that occurred on Otago's Mainland Poultry Hillgrove farm in 2024 was estimated to cost \$25 million.<sup>32</sup> If an outbreak of HPAI was to occur throughout New Zealand, and if MPI were to cover MPI 50% of these costs for multiple farms, this would cost the country hundreds of millions in taxpayer dollars. The government is obligated to invest taxpayer money in projects and development strategies that are beneficial and acceptable to the majority of citizens. Considering the majority of New Zealander's do not support factory farming<sup>33</sup>, the use of public funds to facilitate the mass slaughter of animals is unlikely to be supported by the taxpayer.

## 7. Discrepancies with proposed regulations

MPI's proposed regulations offers protection to humans who are in contact with contaminated chickens with the focus being managing the risk of disease after it has been contracted – rather than taking measures to reduce the initial risk. Under Section 1.5 of the proposal views of how HPAI should be managed are provided as outlined below.

In reference to the Department of Conservation:

*'The Department's focus will be on minimising spread on public conservation land and supporting the health and resilience of threatened bird populations through conservation work, such as breeding and predator control programmes.'*

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<sup>30</sup> The New Zealand Government. (2025). *Agreement signed on poultry biosecurity*.  
<https://www.beehive.govt.nz/release/agreement-signed-poultry-biosecurity>

<sup>31</sup> MPI. (2025). *Proposed regulations for managing high pathogenicity avian influenza H5N1 in poultry*.  
<https://www.mpi.govt.nz/dmsdocument/70525-Discussion-document-Proposed-regulations-for-managing-high-pathogenicity-avian-influenza-H5N1-in-poultry/>

<sup>32</sup> The New Zealand Government. (2025). *Agreement signed on poultry biosecurity*.  
<https://www.beehive.govt.nz/release/agreement-signed-poultry-biosecurity>

<sup>33</sup> Verian. (2025). "SAFE Public Perceptions Research Report".

In reference to human health:

*'Health agencies, the Ministry of Health and Health New Zealand / Te Whatu Ora, have developed guidance and resources to help people understand the health risks and how to protect themselves from HPAI H5N1'.<sup>34</sup>*

Section 4.1 of the consultation document outlines the following suggested measures for farmers:

1. Preventative measures (such as fencing or bird-scaring devices)
2. Depopulation of infected and potentially infected animals
3. Disposal and bio secure transport of potentially contaminated animal products
4. Cleaning and disinfection of facilities and equipment; and/or
5. Personal protective equipment (PPE) requirements for on-farm use <sup>35</sup>

Regulatory focus should be on inherent risks associated with intensive farming that unquestionably contribute to the spread of disease amongst farmed birds.

## **8. Conclusion**

The 2024 outbreak of HPAI in on the Mainland Poultry Hillgrove farm in Otago is evidence of a deeply flawed farming system. Seventy two percent of New Zealanders oppose the confinement of animals on factory farms,<sup>36</sup> however the decision to slaughter 200,000 chickens within a week rather than allow them time to recuperate, reflects how little the lives of farmed animals are valued. The proposed regulations contravene the legal obligation to protect animals from disease. They acknowledge the spread of HPAI is inevitable,<sup>37</sup> but suggests the mass killing of birds is the most appropriate management tactic. To imply individual farms can manage the spread of disease individually is unjustifiable when the intensive factory farming model is itself is the catalyst for outbreaks and rapid spread of disease.

SAFE urges the MPI to abandon the proposed regulations and instead commit to a phased transition away from factory farming systems. Ending these practices is essential to safeguarding public health and upholding the principles of the Animal Welfare Act.

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<sup>34</sup> MPI. (2025). Proposed regulations for managing high pathogenicity avian influenza H5N1 in poultry. <https://www.mpi.govt.nz/dmsdocument/70525-Discussion-document-Proposed-regulations-for-managing-high-pathogenicity-avian-influenza-H5N1-in-poultry/>

<sup>35</sup> MPI. (2025). Proposed regulations for managing high pathogenicity avian influenza H5N1 in poultry. <https://www.mpi.govt.nz/dmsdocument/70525-Discussion-document-Proposed-regulations-for-managing-high-pathogenicity-avian-influenza-H5N1-in-poultry/>

<sup>36</sup> Verian polling (see attachment)

<sup>37</sup> MPI. (2025). Proposed regulations for managing high pathogenicity avian influenza H5N1 in poultry. <https://www.mpi.govt.nz/dmsdocument/70525-Discussion-document-Proposed-regulations-for-managing-high-pathogenicity-avian-influenza-H5N1-in-poultry/>