Dear Sir / Madam,

**Farm Animal Welfare Committee Review of the 2005 FAWC Report on the Welfare Implications of Farm Assurance Schemes**

Thank you for inviting the Farmers’ Union of Wales to contribute to the above consultation. Following an internal consultation with its twelve County Branches, the Union submits the following comments for your consideration.

**General Comments**

i. Positive Impact

Members generally believed that many of the factors included in those farm inspections resulting from participation in Farm Assurance (FA) did not directly correlate with improvements in animal welfare. Indeed, members cited high levels of bureaucracy and administration relating to factors which were deemed to be out with the scope of this scheme.

Whilst several members believed that participation in FA had lessened the burden of those inspections undertaken by other bodies, such as Local Authorities, others believed that many of the factors inspected within the FA scheme were also inspected under cross-compliance. Several members also stated that the current level of administration and paperwork could function to divert farm resources away from livestock care.

Several members stated that consumer awareness of animal welfare and UK livestock welfare schemes may have improved in recent years. The Union believes that it is essential for schemes, such as FA, to be able to withstand both industry and public scrutiny and would stress the importance of swiftly and appropriately counteracting any negative media attention in order to safeguard the integrity of the scheme and to maintain levels of producer and consumer engagement.

ii Accreditation

The Union believes that there would be merit in identifying any inter-organisation duplication in inspections relating to animal welfare, with a view to streamlining current scheme priorities and identifying those measures which have the greatest impact on animal welfare.

The Union recognises that the updating of assurance scheme standards is often as a by-product of welfare research and technical developments. In order to shorten the period of knowledge transfer, several members commented that assurance schemes should co-operate and increase communications and information dissemination. This would ensure that current research funding
areas and areas prioritised for future funding are not duplicated across different welfare related bodies. Where appropriate, research data should be shared between organisations.

Several members stated that some time lapse between the collation and evaluation of scientific data, knowledge transfer and changes in legislation or FA standards was inevitable and appropriate. The resultant effect of changes to legislation or FA standards must be thoroughly evaluated prior to the initiation of any change. Such changes should only occur when backed by properly evaluated evidentiary support, when proportionate to the risks entailed and when supported by relevant stakeholders. The Union supports the use of science-based animal welfare indicators as a possible means to simplify the legal framework and allow flexibility to improve the competitiveness of livestock producers. However, it is essential that any welfare policies are based on robust scientific data and not consumer or retailer fads and preferences.

Changes to legislation or farm assurance standards will be most successful where industry buy-in has been achieved.

Members did not believe that FA scheme providers should be more active in addressing ongoing welfare issues, such as lameness in dairy cattle and sheep, as such issues are already well served under cross compliance and by consultation with veterinary practitioners.

The Union has consistently maintained that the high financial and administrative burden placed upon compliant livestock producers in Wales and the UK has led to such producers being at a competitive disadvantage when compared to their counterparts in the EU. At present, a number of critical shortcomings in existing EU animal welfare policy enforcement remain and measures to address and mitigate these shortcomings are essential.

For example, the introduction of the ban on conventional laying cages for hens was largely ineffective and, to date, millions of hens throughout the European Union remain housed in illegal low welfare ‘battery’ cages. This lack of enforcement functions to reduce the competitive ability of compliant Member States and vastly undermines the costly efforts of compliant producers. Animal welfare standards often impose additional and substantial monetary costs. It is important to recognise that these costs may be asymmetrically applied along the food chain and, in many cases, the producer will bear the majority of any welfare associated expense. The establishment of any welfare policy without the enforcement requisite to policing, maintaining and protecting such policy throughout the EU is not only detrimental to the competitiveness of compliant producers but also has a negative impact on animal welfare and the perception of the effectiveness of animal welfare regulation by the general public.

At present, animal welfare labelling on food produce can lead to inaccurate perceptions and uninformed purchases if the consumer is misled by labelling which does not properly reflect the welfare standards achieved. Without clear and truthful labelling, consumers will not be empowered to respond to higher animal welfare standards and cannot therefore support the efforts of high welfare farms. It is therefore essential to ensure that consumers are not deceived by misleading animal welfare claims; from produce emanating from both within and outside the EU. Clear and accurate labelling, coupled with consumer awareness campaigns, will be of benefit in promoting the exceptionally high standards of animal welfare achieved by Welsh and UK producers.

The Union recognises that transparency was a main recommendation of the 2005 FAWC report and that the provision of anonymous data can potentially be used to demonstrate how effectively assurance schemes are working. However, several members expressed concern that the provision of such data can often function to alter the recommendations and conditions for gaining assurance
status – without proper evaluation or sufficient population sampling - and the Union would caution over-reliance on such data if used in isolation.

iii Assessment/Audit

The Union would query the continued reliance on organisations such as the RSPCA and the Soil Association when developing welfare outcome assessments for major livestock species. The Union would stress the importance of industry engagement on such matters and would highlight the importance of producing assessments which are proportionate, financially viable, practicable and backed by rigorous scientific study. It is essential that welfare outcomes are not based on erroneous public perceptions or consumer fads.

The Union believes that Welsh livestock producers have the knowledge, competency and experience requisite to ensuring and maintaining high standards of animal welfare on-farm. Members believed that practical experience and training was more important than the provision of an academic qualification or certificate. Moreover, several members expressed concern that this proposal could lead to additional and costly certification procedures for existing livestock producers; irrespective of their current competency level. Moreover, as previously stated, welfare policies which do not have the enforcement levels required to properly police, maintain and protect such policies throughout the EU are detrimental and function to reduce the competitiveness of compliant, high welfare, premises.

Members answering this section of the consultation unanimously opposed any moves to include other input measures, such as stockman competency, into farm assurance schemes.

The Union believes that moves to formalise stockman training and set a requirement for certificates of competence is overly bureaucratic, disproportionate and without any reasonable justification or evidentiary support.

iv Supply side

Members believed that the use of herd and flock health plans should be part of a voluntary additional process and did not need any legislative or scheme changes to be further adopted by the industry.

As previously stated, the currently observable lack of equivalence in welfare across the EU serves to demonstrate the lack of progress on the FAWC recommendation that ‘retailers and the food service sector should show leadership and apply consistent animal welfare standards to domestic and imported animal products and offer information to their customers’.

v Demand side

The Union believes that, whilst numerous surveys have cited consumer preferences for high welfare standard foodstuffs, other factors will predominate depending on the changing circumstances of the consumer. For example, during a recession, it is reasonable to assume that price will be one of the most important determinants of food selection and purchase. Changing consumer priorities make it essential to ensure that the costs of producing high welfare standard produce do not detrimentally affect the competitiveness of UK producers. At present, it is unclear to what extent retailers and supermarkets are exploring animal welfare as part of the ‘food quality mix’. The Union would reiterate that current labelling legislation continues to encourage and promote consumer confusion and misdirection and this is detrimental to the success of compliant UK producers.
The FUW fully supports the development of added value products and niche markets in order to allow businesses to reach their potential during favourable market conditions. However, whilst there is room for improvement in developing new markets and trade opportunities, it must be noted that over-emphasis upon niche markets, at the cost of mainstream markets upon which the vast majority of producers depend, will likely be detrimental to the sector as a whole. This is particularly pertinent given the current financial climate, and the impact that this has on consumer spending on added value produce.

Members stated that the premium which was historically available to farmers in a FA scheme was now no longer discernible from normal market prices and added that the ‘gold standard’ of welfare once associated with the FA scheme had become the norm; with prices reflecting this transition. Members did not believe that there was now sufficient premium available to fund production system upgrades.

The Union believes that there is much room for improvement in public sector procurement. The criteria used in public sector procurement are largely based around price and convenience; with welfare, environmental and provenance issues being secondary to the preference of obtaining a ‘basket’ of cheap goods from one or two suppliers. The need for more local procurement to support the UK food and farming sector and reduce food miles is well recognised and the Union continues to maintain that the high welfare and environmental standards achieved by Welsh and UK producers should be rewarded with an increase in local procurement.

The Union believes that membership of FA and other certified schemes should contribute to focusing Government on reducing inspections to those at low risk of non-compliance. The Union welcomes the principle of ‘earned recognition’, as outlined in the Welsh Government ‘Working Smarter’ review. The Union believes that the application of earned recognition rewards and recognises the efforts of compliant individuals or businesses and the FUW would welcome moves to reduce the administrative burden currently placed upon compliant livestock keepers. The Union does not foresee any impact on farm animal welfare by using this approach.

**vi FAWC’s recent advice on relevant topics to farm assurance standards**

Members did not believe that there was presently any merit to incorporating any further welfare standards into the FA scheme. Several members commented that stockmen currently possess sufficient experience and knowledge to enable the identification of health and welfare issues on-farm and to identify the correct breed for a given management system. Furthermore, members believed that the prevention, diagnosis and treatment of health issues and disease contingency planning was best served by veterinary practitioners, in conjunction with farm personnel, and that the inclusion of such issues with FA was therefore not warranted. Indeed, members queried whether FA inspectors would be sufficiently qualified to undertake inspections which included such additional criteria.

Members stated that many of the factors cited, such as the surveillance and control of lameness in sheep, were already covered under cross compliance, herd health plans and communications with private veterinary practitioners and that duplication of such factors into FA would do little to improve animal health and welfare.

The Union would reiterate that the inclusion of any of the measures cited should only occur when it is proportionate to the risk involved and where UK producers would not be financially and administratively disadvantaged when compared to their European counterparts. The Union would prefer to see resources being offered to ensuring equivalence of current welfare standards across the EU and appropriate and clear welfare labelling.
The present consultation document makes little or no reference to higher welfare standards resulting in improved returns for Welsh producers. As such, no such additional measures should be required without a guarantee from retailers and supermarkets that farmers will receive additional payments, over and above normal market prices, for undertaking those measures.

I trust that due consideration will be given to the preceding information.

Yours sincerely

Dr Hazel Wright
FUW Senior Policy Officer