



**FAWC CONSULTATION:
A LONG TERM STRATEGY FOR FARM ANIMAL WELFARE IN
GREAT BRITAIN – ETHICAL PRINCIPLES & WELFARE
ASSESSMENT, SURVEILLANCE AND STANDARDS.**

RSPCA RESPONSE

The RSPCA welcomes the opportunity to contribute to the FAWC’s deliberations on the nature and scope of a future strategy for farm animal welfare over the next twenty years. Clearly, twenty years is a long time in real terms, but in terms of achieving progress in improving farm animal welfare, history suggests that it is rather a short period. For example, the sow stall and tether system was identified in the Bramble Committee Report in 1965 as being unacceptable in welfare terms, but it was not until some 34 years later in 1999 that the system was finally phased out in the UK, and it will still be permissible in the EU as a whole until 2013.

However, a number of recent significant developments in the area of livestock welfare have given grounds for optimism that potentially at least, progress towards positive change may now be achieved more swiftly than in the past. For example, there is now improved dialogue – and hence understanding and cooperation - between key stakeholders (industry, food sector, research scientists, Government, animal welfare groups). Also, farm animal welfare, including the science of welfare, is now accepted by most as a ‘mainstream’ issue rather than a fringe concept, including by the farming industry which is beginning to act proactively to introduce new practices to improve health and welfare. In addition, the marketplace – through both major companies and the consumer - is increasingly driving change ahead of legislation.

With this potential in mind, a considerable number of changes might reasonably be expected to be attained within the next twenty years, as well as some others which may be more aspirational than achievable within that timescale, but which nevertheless can and should be initiated now. The following outlines the RSPCA’s thoughts on both these categories, together with reasons for setting the goals and how they might best be progressed.

Individual issues

- Within twenty years, mutilations (including those relating to identification) or other painful and/or distressing procedures should have been prohibited. This must be seen as an eminently achievable aim, as welfare science and technology provide more information about how to overcome the need to, for example, tail dock pigs or beak trim laying hens. Systems, environments, genetics and management could and should be designed and utilised to reduce the risk of behaviours developing that might previously have led to the application of mutilations in an attempt to reduce the severity of the consequences. This area highlights the need to improve technology transfer, through identifying the best methods of ‘translating’ information gleaned from research into a form that is understandable by, and relevant to the end user (such as the farmer).
- All close confinement systems for farm animals should have been phased out within twenty years. In recent years in the UK, a number have already been prohibited or are being phased out (e.g. veal crates, sow stalls, conventional battery cages), but some remain and are currently permitted despite indications from research and practice that they can cause varying degrees of suffering and distress and can contribute to the development of abnormal behaviours. Development of alternative systems and practices that both achieve the aims of the original close confinement systems (e.g. protection of piglets in the case of farrowing crates) and provide acceptable levels of welfare to all the animals involved, must be pursued. Breeding strategies may also need to be examined, for example, in cases where selection in pursuit of increased productivity (e.g. litter size in sows) may have unwittingly resulted in selection against traits beneficial to welfare (e.g. positive maternal behaviours in sows).
- All farm animals must be provided with environmental enrichment appropriate to their species, to allow them to express natural behaviours. It is already known that barren environments can contribute to the development of abnormal behaviours (e.g. tail biting in pigs), and thus have an adverse effect on both animal welfare and productivity. Further information on key behaviours and hence appropriate enrichment needs to be gathered for some species through scientific research, though enough is known about the needs of other species to make it entirely reasonable to insist on the provision of certain enrichment under current legislation. Indeed, in the case of the European Directive on the protection of pigs, and associated UK legislation, provision of materials to allow expression of rooting behaviours is already included. However, unfortunately, the wording of this provision allows for variable interpretation of the exact nature of the requirement, which in the UK has led to failure to provide appropriate materials to all pigs. Such loopholes must be eliminated to ensure that all animals have access to appropriate provisions in this respect.
- On-farm slaughter of poultry, especially of the very vulnerable end-of-lay hens, should become the norm. Some work is already underway in this area, and any

methods employed need to be at least welfare neutral compared with current practice. In technical terms, there should be no insurmountable problems associated with achieving this aim.

- All slaughter animals should go directly from farm to slaughter, and not undergo complex and/or long distance journeys either within or from the UK. Within Great Britain alone, achievement of this goal could be facilitated by a change in policy of a number of major retailers, that currently source from a small number of centralised abattoirs rather than from a wider range of smaller local slaughterhouses. The sheep sector in particular should move away from the practice of selling slaughter animals to dealers at markets. This approach will fit well with the increasing drive towards environmentally friendly policies and practices in the UK, since it would help to reduce ‘food miles’ and the associated use of resources and potential for pollution relating to road transport.

Setting standards and measuring outcomes

- EU (or eventually, even global) agreement on the key biological characteristics of each species, and that these need to be catered for in legislation, should be pursued and achieved within the next few years.
- A set of key ‘responsibilities’ of humans towards animals – possibly based around an expansion and refinement of the FAWC’s Five Obligations – should be agreed and enshrined in legislation
- Global standards (e.g. OIE) are likely to be developed further and to some extent, implemented, at least through retailers’ sourcing policies, within the next twenty years. Whilst they will be very basic and unlikely to affect UK production directly, they could have indirect effect through the market place, either positively, or negatively if product labelling is unclear/misleading regarding the comparative welfare ‘level’ achieved through the baseline standards.
- Health and welfare monitoring should become commonplace on all farms, and information on disease and on key welfare indicators across the UK held centrally so that an overall picture of ‘the state of welfare in Great Britain’ can be gauged year on year. This is already an objective under the Government’s Animal Health and welfare Strategy and requires effective cooperation and coordination from all relevant stakeholders if it is to be achieved. Currently, enforcement bodies make visits to only a small proportion of farms, which may therefore only be subject to any kind of audit if they are members of assurance schemes (see below). A more coordinated approach from the veterinary profession to collecting and utilising relevant information during farm visits must also be developed. Self-audit may help, if farmers are properly trained – but must not be only way in which data is gathered, as it is clearly open to abuse and quality control will be poor.

- The further development of farm assurance schemes will occur in coming years, with greater pressure on schemes to provide evidence to back the claims they make about what they are ‘assuring’, including those relating to animal welfare. At present, all UK assurance schemes are based around the setting and auditing of ‘input’ or resource standards. Those which relate to the care of livestock are developed with varying degrees of reference to best knowledge (derived from practical experience and scientific research) as to how to provide for animals’ needs within a commercial farming environment. However, whether or not they do in fact result in good welfare for the animals is not currently formally assessed, though essentially subjective assessment of this aspect may be made by some schemes. There is increasing consensus that it is no-longer acceptable to assume good welfare based simply on the resources provided for the animals in question, and the development of ‘welfare outcome assessment’ auditing is gathering pace. Within a few years, it is envisaged that all assurance schemes will include some form of ‘outcomes’ assessment of certain animal-based indicators, as a way of ensuring that the requirements of the scheme do result in the welfare benefits they claim, and also as a marketing tool.

The marketplace and welfare labelling

There is without doubt an increased interest in, and awareness of farm animal welfare issues amongst the British public, evidenced not only by the results of surveys commissioned and/or undertaken by a wide range of bodies, but also by the more tangible sales figures for animal products that are, or are perceived to be, produced under higher welfare conditions. However, immense confusion and misunderstanding still remain amongst many with regard to the way in which farm animals are produced, and which products to purchase in order to support and encourage farming systems that result in better animal welfare. Over the coming years, it is likely that the influence of the marketplace will increase, and that of UK/EU legislation will decrease, with regard to driving forward progress in farm animal welfare. The recent problems encountered within the EU when trying to secure agreement between member states on new legislation to protect broiler chickens illustrates the increasing difficulty associated with reaching consensus on animal welfare law as the EU expands. Through projects such as the European Commission-funded Welfare Quality project progress, Europe-wide standards on welfare and labelling will be developed and implemented, giving consumers greater opportunity to exercise their powers in making an informed choice about which products they buy, and hence which husbandry practices they support and encourage. It seems inevitable that over the next few years, the use of labelling in this way will develop further, but the direction of that development, and its true value to farm animal welfare will depend a great deal on whether the systems chosen are clear, understandable and based on parameters that are meaningful from the animals point of view. Decisions on these vital issues must not be left to politicians, or indeed to consumer perception, but must include the views of those with expert knowledge of the key welfare needs of the various farmed species.

Education

The public

In its consultation paper, the FAWC mentions that it recognises the need for dialogue between various interest groups, and respect for alternative views, with the goal being consensus. In order that the views of potentially the most influential sector of all, namely the consumer, can be taken into account without the risk of effecting change based on perception, rather than actuality with regard to the needs of farm animals, it is essential that public knowledge, awareness and understanding of farm animal production and welfare is improved significantly. If this is to be achieved to any great extent, animal welfare as an entity needs to be included as part of the formal education of all children and young people. The RSPCA firmly believes that animal welfare provides a valuable context for learning, and that teachers should be given opportunities – through both their initial training and in-service development (INSET) – to understand how animal welfare relates to the statutory requirements of the National Curriculum for England and Wales.

For example, Science and Citizenship are two carrier subjects for animal welfare, but influence is needed within the education sector so that links are made with the farming community and food retail industry. To that end, we welcome the recent announcement by the Government of the involvement of schools in the Year of Farming and Food in 2007, with the stated desire that all school children should visit a farm. Associated initiation of links with livestock farmers and farming in general could help to improve the image of the industry and jobs within it, which in turn could improve the level of skills, knowledge and qualification of those choosing to work within it (see section below).

The aim of farm animal welfare education in schools should be to ensure that young people understand their responsibility as informed consumers and the impact they – and others such as Government, the food industry and farmers – have on the welfare of farm animals. The new syllabus, C21st Science, offers considerable opportunities in this respect, and allows for an ethical dimension, though for the youngest children especially those in bigger cities, a very simple approach, namely ‘where our food comes from’ should be the first step, and can involve integration of a range of skills including literacy, geography and numeracy. Thus, with commitment and innovation, farm animal husbandry and welfare, and associated consumer-related issues, could and should be included in the curriculum for all school children in years to come.

Farm animal ‘carers’

It is extraordinary that almost uniquely amongst recognised ‘professions’, livestock farming can be undertaken by anyone at all, regardless of their knowledge, skill or qualifications. For example, it would be highly unlikely that someone would take the wheel of a combine harvester without first undertaking training to ensure that they understood the controls, appreciated the consequences of treating the machine improperly and were competent to control and maintain it. In contrast, an entirely untrained,

unqualified person can be in sole charge of sometimes very large numbers of sentient farm animals each of which has the capacity to suffer. In view of the fact that the State Veterinary Service visits only a very low percentage of farms annually, the conditions in which animals are kept, managed and handled on a day to day basis may never be checked by anyone, unless a farm is a member of an assurance scheme. It must, therefore, be seen as a key objective to ensure that within the next few years, all those in charge of caring for livestock at each stage of their lives are effectively trained and competent to understand and ensure that their welfare is ensured. This precedent has been set in recent EU legislation relating both to live transport (- requirement for training and welfare-focused competency testing to be implemented in January 2008) and the protection of pigs. Requiring initial training and competency assessment, and equally importantly, continuing professional development would not only help to improve the quality of the care given to farm animals, but is also likely to increase the value given to stock-keeper posts, and reduce turnover. The recommendations of the forthcoming FAWC report on stock-keeper training should help to inform the actions that need to be taken in this area over the coming years.

Economics

- The barrier to progress currently imposed by arguments relating to economics needs to be more effectively addressed. Many (e.g. farming industry; Governments) still see welfare improvements as inevitably and exclusively a financial burden. But if the market for higher welfare products were to progress further, and available evidence showing good welfare can be good for everyone were to be more convincingly communicated, progress could perhaps be made in this area.
- CAP likely to be reformed further over next 20 years, to the extent that welfare will be much better incentivised through farm payments regarding those who apply standards above the baseline legislation. Coupled with labelling, this should help farmers to produce, and consumer to identify, buy and hence support, practices that result in better welfare for farm animals. Policies on farm payments should therefore be directed towards this reward-based approach

Overseas factors

Whether 'globalisation' will help or hinder the cause of farm animal welfare in Great Britain in the next twenty years depends on a wide range of micro and macro decisions, from the choice made by an individual consumer, through the buying and information-provision policies of major food manufacturing companies and retailers, all the way up to the WTO policies and rules. There is increasing interest in animal welfare in a number of countries beyond the EU, and it is likely that developments in the USA will have a considerable influence on global markets in coming years, including the 'welfare' market in Great Britain. Forward planning in this area should aim to work on the basis of parity of standards, rather than be country of origin based

(see also ‘Labelling’ section). Globalisation could hinder progress in farm animal welfare if it facilitates the buying of cheaper animal products from a wider range of countries by retailers, wholesalers etc, regardless of the standards under which the animals have been reared, though as discussed elsewhere, public education and effective, transparent labelling could help to overcome this. Encouragement of, and where necessary, pressure applied to major food companies to include farm animal welfare as part of their Corporate Social Responsibility policies should be pursued.

Broad ethical principles

- At present, a number of disparities exist between the treatment of, legislation for and attitude towards animals used for different purposes. For example, legislation allows castration of certain farm animal species at certain ages without the use of pain relief of any kind. However, in Great Britain, castration of puppies or kittens without anaesthetic would be likely to lead to successful prosecution of the individual undertaking the procedure. Similarly, use of electric goads on certain livestock is allowed, but would be deemed unacceptable in the case of companion animals. Such anomalies, which exist due to tradition and to some extent, commercial pressures, need to be addressed. A move towards equal treatment in legislation and practice of all species with equal capacity to suffer, regardless of their purpose in society, should be initiated and achieved within the next few years.
- The Five Freedoms continue to provide a useful framework for delivery of good animal welfare to farmed livestock. They cover both physical and behavioural parameter and provide not only for absence of suffering, but also for a positive state of wellbeing. Thus, in their current form, they are still applicable to, and able to relate to future developments in, farm animal welfare. The Three ‘Rs’ (Reduction, Refinement, Replacement) of Russell and Burch, traditionally applied to animals used in research and testing, could usefully be applied to farm animals as well. For example, a reduction in the ‘wastage’ of many new born farm animals, and of older animals through culling due to reasons other than untreatable suffering, needs to be achieved. Reducing the number of males from egg-laying strains of chickens, and male dairy calves and goat kids, that are routinely killed shortly after birth should be a target, and could be achieved through application of new technologies (see ‘Technology’ section) and/or selective breeding policies and/or altered market requirements. Routine destruction of new born animals should no-longer be accepted as a normal part of livestock farming within the next few years.
- Use of science and technology in farming has brought both benefits (e.g. healthcare), and suffering (e.g. use of breeding technology to ‘improve’ productivity in broiler chickens, turkeys and dairy cows, resulting in associated health and welfare problems) to animals. If harnessed and channelled in the ‘right’ direction, technologies could help to reduce or even overcome production and system-related welfare and ethical problems e.g. use of gene mapping to selectively breed more

robust, healthy animals; use of sexed semen to reduce the number of dairy-bred bull calves born and subsequently destroyed; use of technology to alter the gender of unhatched chicken embryos to obviate the need to destroy 'unwanted' male chicks from egg-laying strains of chicken. Use of breeding technologies to manipulate animal behaviour - undertaken through 'conventional' selection methods for many generations but sidelined in favour of productivity at all costs in recent times – could also reduce suffering by reducing reactivity, stress, aggressive behaviours etc. However, even when welfare outcomes are positive, selective breeding raises ethical issues. Should we fit the animal into the system, or design the system to suit the animal? Is it ethically acceptable to alter behaviour of an animal through genetics? Does it matter as long as the welfare outcome is good for the animals concerned? It is important that these questions, and many others relating to the use of breeding technologies in farming, are carefully considered ahead of application. It is therefore extremely disappointing that the Government has recently rejected the recommendation made by the FAWC in its report on the welfare implications of breeding technologies on farm animal welfare that an independent expert body should be set up to oversee this area of farm animal welfare, providing advice to all on new and emerging technologies and their potential effects on the wellbeing of farm animals. The RSPCA was, and continues to be very supportive of this concept, and urges that pressure continues to be brought to bear on the Government in order to effect a change of mind on this issue. It is likely that the need for such an expert advisory body will become ever more pressing over the next twenty years as existing technologies develop and new ones emerge. Use of gene mapping, for example, to achieve 'progress' in the genotype and phenotype of farmed species is likely to gather pace. It should be a pre-requisite for use of such tools that selection indices include welfare-based parameters in addition to those linked to productivity. Encouragingly, there has been a shift towards such an approach recently in, for example the dairy industry. However, progress is slow and much more needs to be done more quickly to bring about a noticeable reduction in the health and welfare problems to which the genetic make-up of the animal or bird contributes. Within twenty years, it should be the aim to have eliminated genetically-based conditions associated with productivity.

RSPCA
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