



Consultation Response

FROM THE RSPCA IN WALES

Sustainable farming and our land: simplifying agricultural support

October 2020

RSPCA Cymru welcomes this latest opportunity to input into the Welsh Government's plan for providing financial support to the farming and agricultural industry, following the UK's withdrawal from the European Union and the end of the Implementation Period. While elements of this consultation is beyond the remit of the RSPCA, we are eager to respond to specific proposals at what we continue to regard a critical juncture for farm animal welfare.

The legacy of the Common Agricultural Policy, first implemented under the Treaty of Rome in the early 1960s, was to increase food production in a way that intensified farming, with the result being contrary to good animal welfare standards. The philosophy and wider circumstances, however, underpinning any new system in 2020, should be very different - to take into account increased public expectations and understanding of higher welfare, as well as advanced animal welfare science.

Polling for RSPCA Cymru has previously found that 80 percent of adults say that animal welfare standards are important in their purchasing decisions¹. In a similar vein, Eurobarometer surveys show that 62 per cent of the British public do not feel animal welfare receives adequate importance in UK food policy²; while 72 per cent would pay more for products from animal welfare-friendly production systems³. Additionally, 82 percent of people support farmers receiving subsidies to support animal welfare⁴. Despite this, current incentives promote intensive housing systems, as well as management and breeding practices, that primarily prioritise productivity over health and welfare. Instead, we continue to call for any financial incentives to result clearly in improved animal welfare above the current standard industry practice, promote continuous improvement of animal welfare, and provide a good life and humane death for all farm animals; underpinned by enforcement, transparency and evidence.

Since the result of the 2016 EU membership referendum was confirmed, the RSPCA has prioritised ensuring any risks for animals associated with withdrawal are mitigated, while all opportunities for improving animal welfare standards following departure are seized. A new system of agricultural support in Wales following Brexit and the end of the Implementation Period is regarded as a significant opportunity to maintain and enhance welfare standards; which could transform the lives of millions of farm animals in Wales. With 9,500,000 sheep, 166,600 beef breeding herds, 254,300 dairy breeding

¹ YouGov Plc. Total sample size was 1,001 Welsh adults (aged 18+). Fieldwork was undertaken between 4th - 8th September 2014. The survey was carried out online. The figures have been weighted and are representative of all Welsh adults (aged 18+).

² European Commission, 2005. Eurobarometer – Attitudes of consumers towards the welfare of farmed animals Q12.

³ European Commission, 2016. Attitudes of Europeans towards animal welfare. Special Eurobarometer 442

⁴ RSPCA Report - Into the fold: Targeted financial support to improve farm animal welfare.

herds and 23,200 pigs in Wales⁵, the policy opportunity to improve animal welfare standards presented to the Welsh Government is arguably the biggest in scale since the onset of devolution.

Under a new Sustainable Farming Scheme, we call for a two-tiered payment approach, with Tier 2 payments awarded to producers that are members of a formally-recognised higher welfare farm assurance scheme. These payments would then be underpinned by 'transitional payments', whereby producers are financially incentivised to take steps that help them achieve eligibility for the Tier 2 payment, e.g. payments to cover one-off capital costs for new systems or for stockmanship training (Tier 1 payments). This would be in line with previous support via schemes for capital expenditure.

Being a member of a recognised farm assurance scheme delivering to the RSPCA's welfare standards, or equivalent, could offer the Welsh Government clear assurances that farm animals were being looked after to high standards for the whole of their life. Such a scheme could apply validated welfare outcome assessments to farm animals, and apply a proposed Good Scheme Framework⁶ to deliver continuous welfare improvement over time - ensuring both Welsh farms, and - by extension - Welsh produce is being reared and slaughtered to the very highest standard; and farmers are being incentivised to deliver such standards.

Q5. DO YOU AGREE WITH THE PROPOSAL TO RETAIN THE ENVIRONMENTAL BENEFITS OF GREENING PRACTICES THROUGH CROSS-COMPLIANCE?

The Welsh Government clearly acknowledges that Greening practices have contributed little to policy objectives in Wales - including in improving food safety and animal welfare standards. It is concerning, therefore, that such a large proportion of farm income support - 30 percent of the Pillar One budget - has been connected directly to these practices under previous EU rules; given the wider impact this level of incentivising finances could have had in other areas of agriculture. RSPCA Cymru believes the implementation of new agricultural support schemes following the conclusion of the Implementation Period offer a unique opportunity to drastically enhance farm animal welfare standards in Wales; and to incentivise farmers to deliver a better life for the millions of farm animals - and a gradual transition towards such a model should be introduced as soon as possible.

While the RSPCA appreciates that many discussions around the long-term new farm support system for Wales will follow when a new Agriculture (Wales) Bill is proposed in the next Senedd term, the interim period offers an ideal opportunity to begin transitioning the system towards a scheme that more clearly incentivises animal welfare. Given the stated failure for mandatory, EU-imposed Greening practices to deliver on Welsh Government policy aims - and the "significant complexity" the Government states they present to farmers⁷ - this area of financial support would appear to provide one such opportunity to begin, at least in part, transitioning towards a new model.

The RSPCA agrees that a system of enforcement, such as cross-compliance, is required in the new farm support system. However, cross-compliance was a blunt instrument at enforcing payments and a more flexible system encouraging compliance for minor offences may be needed.

⁵ Welsh Government, Farming Facts & Figures 2018

⁶ D C J Main, S Mullan, C Atkinson, M Cooper, J H M Wrathall and H J Blokhuis, 2014. Best practice framework for animal welfare certification schemes. Trends in Food Science & Technology 37, 127–136

⁷ Consultation document - Sustainable Farming and Our Land: Proposals to continue and simplify Agricultural Support for Farmers and the Rural Economy, p10, 31 July 2020

Q18. DO YOU AGREE WITH THIS PROPOSED REDUCTION IN BPS INSPECTION RATES?

The RSPCA notes the Welsh Government's intention to reduce the frequency of spot-checking and inspections for individual claimants linked to the Basic Payment Scheme. Given the present focus on payments being made based on hectares of farmed land, and the proposed retention of some Greening measures, the frequency of inspections for Direct Aid will not have a significant impact on farm animal welfare. However, the Welsh Government also needs to ensure reducing inspection rates does not impact on irregularities under BPS and so any compliance scheme needs to fulfill the same level of enforcement as now.

Given the Welsh Government's policy intent to reduce the frequency of inspections for claimants, and the possibility of this approach being incorporated into longer-term proposals within the Agriculture (Wales) Bill, the RSPCA wishes to highlight the role existing and successful farm assurance schemes could play in supporting this policy intent longer-term, while safeguarding standards connected with any new financial support scheme which places greater weight on farm animal welfare standards.

Indeed, financial support could be given via any future Sustainable Farming Scheme for members of a formally-recognised higher welfare farm assurance scheme, such as those delivering the RSPCA's scientifically-informed higher welfare standards, or equivalent. The security offered by external, credible assurance schemes and their own regulatory frameworks would support the Welsh Government in adopting a risk-based, targeted approach to inspections, which could support the need to reduce inspections for individual claimants - given the checks and balances already offered by an external assurance model; ensuring compliance with a set of established farm animal welfare standards.

Q18. DO YOU AGREE WITH REPLACING THE EU MISSION, OBJECTIVES AND PRIORITIES FOR RURAL DEVELOPMENT SUPPORT WITH WELSH SPECIFIC DEFINITION FOR RURAL DEVELOPMENT?

Q19: DO YOU AGREE WITH THE PROPOSED AMENDMENTS OF THE MEASURES?

Given the vast impact that rural development has on Wales' economy, and the specific challenges the agricultural community in Wales face, replacing EU mission, objectives and priorities with a Welsh-specific definition of rural development is a welcome approach - and is consistent with the implementation of a new programme of agricultural support which is tailored specifically to Wales. It is concerning, however, that the proposed Welsh-specific definition of rural development is lacking a clear reference to animal welfare. Given the Welsh Government supplementary proposals to amend the titles of Measures supporting rural development to better incorporate animal welfare, such as '*Knowledge transfer and information actions*' - as previously linked to Article 14 of Regulation (EU) No 1305/2013 - this omission from the definition of rural development would appear to be an oversight which we would urge the Welsh Government to address following this consultation. Enhanced animal welfare standards on Wales' farms offer unique opportunities to improve the environment, create jobs and further prosperity - while giving confidence in local food supplies, and improving the lives of millions of animals across Wales. Improving animal welfare is also integral to the Wales farm brand and should be used as a market differentiator. As such, we believe animal welfare is integral to rural development - and thus should be incorporated into the definition.

Q20: ARE THERE ANY FURTHER AMENDMENTS OR OPTIONS YOU WOULD LIKE TO SUGGEST FOR ANY MEASURE?

The RSPCA broadly welcomes that the Welsh Government plans to incorporate specific Measures related to animal welfare into the new domestic framework. Nevertheless, such a Measure - previously under Article 33 of Regulation (EU) No 1305/2013 - had been available but not been incorporated under

the Welsh Government's RDP for 2014 to 2020, meaning opportunities to recognise and incentivise farmers exceeding mandatory standards have not been seized.

We note the Welsh Government also states that the inclusion of this Measure into the framework does not guarantee it will be used. Indeed, across the European Union, estimates suggest only 1.5 percent of rural development funding⁸ has been used for direct animal welfare initiatives - and Article 33 itself has been used only very sporadically, including in Germany and Italy⁹.

As long as this list of Measures is retained, we would urge the Welsh Government to ensure the transposition and inclusion of Article 33 ultimately leads to interventions and additional agricultural support for farms exceeding mandatory animal welfare standards; ensuring such an approach is central to future plans for rural development.

Furthermore, in the longer term, it may not be prudent for the Welsh Government to seek to loosely retain the system of Measures currently used by the EU, given the anticipated changes due at the European level to the Common Agricultural Policy, with its nine new specific objectives - including the protection of food and health quality, and a stated focus on improving animal welfare. We would urge the Welsh Government to explore whether any emulation of this new post-2020 CAP would be beneficial in implementing a new support scheme for rural development which better encourages higher welfare standards.

Q24. DO YOU AGREE WITH INTEGRATION AND ENHANCEMENT OF MONITORING AND EVALUATION OF SUPPORT FOR RURAL DEVELOPMENT, USING WELSH-SPECIFIC OBJECTIVES AND INDICATORS?

Q25. DO YOU AGREE THE WELSH GOVERNMENT SHOULD REPORT ANNUALLY ON THE IMPLEMENTATION OF ITS RURAL DEVELOPMENT PROGRAMME?

RSPCA Cymru would urge any annual monitoring or reporting on rural development in Wales to incorporate an evaluation of improvements, or otherwise, to animal welfare standards across Wales - underpinned by a clear reference to the welfare of farm animals within a new, Welsh-specific definition of rural development. We also believe such reporting would be consistent with the Welsh Government's own reporting requirements under the Future Generations (Wales) Act 2015, given the role animal ownership enhanced animal welfare standards can play in the pursuit of improved economic, social, environmental and cultural well-being. Any monitoring should be frequent enough to assess if the RDP programme streams are delivering value - so the RSPCA is content with annual reporting.

Equally, however - beyond the scope of legislation like the Environment (Wales) Act 2016 and Well-being of Future Generations (Wales) Act 2015 - there is a broader range of legislative mechanisms by which the Welsh Government may wish to consider reporting on - to ensure issues like farm animal welfare are adequately monitored as part of any evaluation of rural development; for example compliance with Codes of Practice for farm animals in Wales - and adherence of other legislation relevant to the keeping of farm animals.

⁸ DG AGRI; Eurogroup for Animal Welfare 2019 CAP, post 2020

⁹ RSPCA - Into the fold: Targeted financial support to improve farm animal welfare, 2018