

# Report on the Welfare Implications of Farm Assurance Schemes

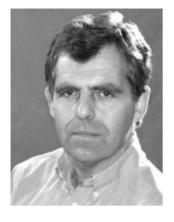
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# CHAIRMAN'S FOREWORD

I am very pleased to introduce this Report on the Welfare Implications of Farm Assurance Schemes which considers their evolution since the publication of FAWC's Interim Report in 2001.

Consumers are concerned about the provenance of the food products that they purchase. They can justifiably expect suppliers to provide assurance in the form of dependable information on food safety, environmental issues and animal welfare amongst other characteristics. Since it is unrealistic to provide very

detailed information on many of the quality characteristics associated with food, much has to be taken on trust through assurance schemes. The assurance provided by these schemes must be verifiable, reliable and accurate if the confidence of the consumer is to be earned.

This report concentrates on assurance in relation to the welfare standards experienced by the farm animals from which livestock products are derived. FAWC believes that assurance needs to embrace the full length of the food supply chain if it is to be meaningful. We are particularly keen to see improvements in the way that animal welfare is assessed, with a greater focus being placed on animal-based measures and welfare outcomes.

FAWC has long championed the principle that a concern for animal welfare is an integral part of food consumption: this must logically apply to all food products from farm animals, from wherever they are sourced. The welfare standards applied to food produced within the Great Britain should equally apply to imported livestock products.

This Report also examines animal welfare in the context of organic certification schemes. Organic farming is characterised by the emphasis placed on the farming system and the legal framework of production standards and inspection. There is also a perception that organic farming is synonymous with higher standards of animal welfare compared with conventional livestock farming. We have therefore given careful consideration to this background before commenting on the organic certification schemes.

FAWC firmly believes that farm assurance schemes have a major role in ensuring acceptable standards of farm animal welfare and looks forward to their further development. The recommendations in this report are directed at all involved in the food supply chain. I hope that this report will strengthen the commitment to animal welfare particularly amongst those engaged beyond the farm gate since they wield great power in the market place and are influential in determining the welfare standards of the food we eat.

Professor C. M. Wathes

# Part I: INTRODUCTION

# Original terms of reference

- 1. In August 1999 the Farm Animal Welfare Council initiated an enquiry into the nature of the links between farm assurance schemes which by then were becoming increasingly prominent and the standards of animal welfare achieved on livestock farms. We started from the premise that farm assurance potentially provided a voluntary, private sector/market based framework (as compared with a public sector/regulatory framework) for ensuring compliance with animal welfare standards. The original objective of our enquiry was to determine whether and to what extent farm assurance schemes were capable of delivering credible assurance of the welfare standards under which farm animals are kept.
- 2. In August 2001 we produced an Interim Report on the Animal Welfare Implications of Farm Assurance Schemes. That report essentially provided a background for our emerging thoughts and we were heartened by the interest it generated, the comments that we received and the action taken in response to our initial recommendations.

# **Current objectives**

- 3. Building on the reactions to our Interim Report, we have prepared this report with the following objectives in mind:
- to assess the further evolution of farm assurance over the last four years;
- to consider the ability of schemes to deliver credible assurance on the welfare standards under which farm animals are kept, the conditions they are exposed to in transit, at market, and at the point of slaughter;
- to review the prospects of future developments in farm assurance in the light of recent policy changes;
- to examine the extent to which welfare assurance is sought by retailers, the food service sector and individual consumers;
- to assess where in the food chain the main drivers for a greater focus on animal welfare issues are situated;
- to draw conclusions about the potential for farm assurance schemes to influence animal welfare and the key requirements if they are to do so;
- to make recommendations as to how assurance schemes can better embrace animal welfare concerns to deliver good welfare outcomes.

#### **Five Freedoms**

4. The Five Freedoms provide a core framework for assessing the welfare of animals, whether on farm, in transit, at market or at the place of slaughter, and FAWC typically refers to these as a starting point in all its reviews of animal welfare issues. The Five Freedoms are:

# • Freedom from hunger and thirst

by ready access to fresh water and a diet to maintain full health and vigour.

# Freedom from discomfort

by providing an appropriate environment including shelter and a comfortable resting area.

# • Freedom from pain, injury and disease

by prevention or rapid diagnosis and treatment.

# Freedom to express normal behaviour

by providing sufficient space, proper facilities and company of the animal's own kind.

# Freedom from fear and distress

by ensuring conditions and treatment which avoid mental suffering.

- 5. In principle, we would expect all farm assurance schemes to include welfare standards based on the Five Freedoms at every stage of production during the time when the animal is alive. Information about these standards should be passed along the food chain to the final consumer, since the purpose of welfare assurance is to serve the buyer's needs.
- 6. When our Interim Report was being prepared one of our main concerns was the lack of documented evidence to substantiate any claims that welfare on assured farms is demonstrably better than that on non-assured farms. We recommended that data collected during State Veterinary Service (SVS) inspections should be expanded to record whether the farm was registered in an assurance scheme; and we felt this information should provide a starting point to see if there was a variation in welfare between assured and non-assured farms. We are pleased that the SVS accepted that recommendation and is collecting the additional information. As these data are accumulated and analysed it could provide a reference point for assessing the impact farm assurance has on the welfare of animals at farm level.

# **Recent policy developments**

7. The report of the Policy Commission on the Future of Farming and Food, published in 2002, (the 'Curry Commission') saw assurance schemes as a potentially valuable way of communicating value to consumers. It recommended that current schemes be rationalised behind the 'red tractor' mark with changes both to the structure of Assured Food Standards (the company responsible for administering and policing of the red tractor mark) as well as to the ownership of assurance scheme standards.

- 8. The Government's Animal Health and Welfare Strategy for Great Britain, launched in July 2004, sets out a framework and direction designed to maintain and improve animal health and welfare standards over the next decade. The strategy is intended to complement and work with the Veterinary Surveillance Strategy published in October 2003. Implementation plans for England, Scotland and Wales will chart the evolution of the Animal Health and Welfare Strategy over time and the delivery of its aims and objectives, and be updated on an annual basis.
- 9. The mid-term review of the EU's Common Agricultural Policy (CAP) and the agreement reached by Member States in June 2003 opens up the possibility of specific schemes to promote animal welfare through being recognised and funded under the CAP Rural Development Programmes. In addition the introduction of a single farm payment linked amongst other things to compliance with animal welfare legislation should aid the enforcement of the legal minimum welfare standard. FAWC has long recommended that support payments to livestock farmers should be conditional on welfare compliance and both welcomes and strongly supports the utilisation of the opportunities that this affords for the development of assurance schemes.
- 10. The recent modification of the Scotland Rural Development programme to introduce a payment for the implementation of an animal health and welfare programme is a good example of how the new CAP measures can be directed towards raising welfare standards in the cattle and sheep sectors. Similar arrangements already exist in Wales where farm improvement grants and technical support on animal husbandry and welfare issues are provided to livestock farmers under the Welsh Rural Development Programme.

# Part II: BACKGROUND

#### **Minimum Welfare Standards**

- 11. The legal basis for minimum welfare standards was established in the general provisions of The Protection of Animals Act 1911 and updated by the specific provisions of the Agriculture (Miscellaneous Provisions) Act 1968. This Act relates specifically to farmed livestock and sets down the legal minimum welfare standards, focusing on the avoidance of unnecessary pain and unnecessary distress (UPUD); and provides the legal basis for the Codes of Recommendations for the welfare of farmed animals. The Welfare of Farmed Animals (England) Regulations 2000 and similar Regulations in Scotland and Wales implement four EU directives that set minimum standards relating to the welfare of all farm animals in the EU.
- 12. Enforcement and achieving compliance with legislated welfare standards and Codes of Recommendations are a public sector responsibility carried out by the State Veterinary Service and Local Authority Inspectors. Compliance with the legislation and codes is however a duty for all animal keepers. The emergence and growth of the concept of farm assurance over the past two decades provides an alternative tier of enforcement in support of the legislative base to help meet increasing expectations regarding the quality standards in food production. The regulatory framework for animal welfare has recently been enhanced by the publication of a draft Animal Welfare Bill, covering England and Wales and a draft Animal Health and Welfare Bill covering Scotland, relating to domestic animals of all types and captive animals. There is a firm commitment by Government that these Bills will be introduced as soon as possible. This will update and bring together existing animal welfare legislation; in particular, by promoting the welfare of all animals it will end the disparity that exists between the legislation governing the welfare for farmed animals, which has been kept up to date, and the legislation for non-farmed, captive animals.

# Development and role of farm assurance

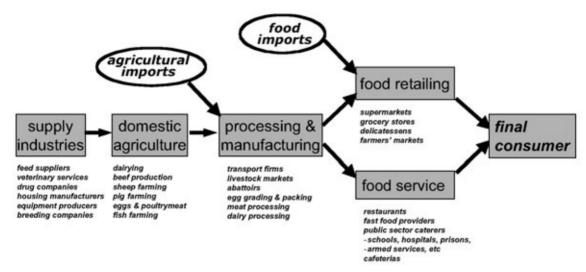
- 13. The origin and evolution of farm assurance schemes was set out in our Interim Report. Briefly, the impetus came from livestock producers, principally in Scotland, who wished to ensure and reflect the quality of their product in an increasingly competitive supply chain. A series of separate schemes focussed on lamb, beef or pigmeat emerged; in Scotland these have now all been combined under the Quality Meat Scotland (QMS) label. In Wales there is a specific scheme for Farm Assured Welsh Livestock (FAWL). In England the original red meat assurance schemes, along with those for the dairy sector and poultry meat, have come under the wing of Assured Food Standards (AFS). AFS was established in 2000 as an umbrella body responsible for co-ordinating nine sector-based assurance schemes in England, Wales and Northern Ireland, each of which operated as an independent company in its own right.
- 14. In addition, the Food Safety Act 1990 initiated the development of assurance schemes operated by food retailers. The responsibility for 'due diligence' in terms of the safety of food products that the Act imposed on them stimulated the establishment of clear chains of traceability back to farm level; along with this, retailers initiated an array of requirements relating to other aspects of the food raw materials they were using.

15. Following the restructuring of AFS, six assurance schemes have integrated more closely behind the Red Tractor logo. The role of the reorganised AFS is to manage the standards underpinning assurance on behalf of the whole food chain, license and police the use of the red tractor logo, and develop equivalence arrangements with other standards in the UK and abroad. More recently AFS has 're-launched' the scheme with a modified logo and a clearer declaration of the integrated assurance and food provenance that it represents. In Scotland, as we have stated, the schemes are owned by QMS but other major stakeholders are involved in the governance of the schemes.

# Assurance in the food supply chain

- 16. It is probably helpful at the outset to clarify the meaning of the various terms that are used in this report and to provide a conceptual framework for the discussion that follows. We take the word 'assurance' to mean the provision of dependable/certified information attached to a product, and relating to particular characteristics of interest about it. These characteristics may relate to constituents, safety, environmental background, location of origin and a range of aspects that may be of interest or concern. In the present context, it is assurance in relation to the welfare standards experienced by the animals from which livestock products are derived that provides the focus for this report.
- 17. **'Farm Assurance'** we understand to mean assurance applied to products with a 'farm' origin and covering the conditions of their production, up to the point of slaughter for livestock products. Given this, then a **'farm assurance scheme'** is a formal framework to ensure the availability, validity and delivery of that assurance information.
- 18. The need for product assurance in a modern society arises from the increasing consumer focus on the qualitative nature of the things they purchase, rather than primarily on just price and availability which were the dominant considerations in less affluent times. Because many of the desired characteristics of products are not discernible by visual inspection, suppliers need to provide that information in order that purchasers can feel confident in what they are buying.
- 19. In the context of food products many of the concerns reflected by the general public and food consumers are related to what takes place at farm level, and farm assurance schemes have arisen to document and deliver specific details of farm-level production and conditions. The length and complexity of the modern food supply chain exacerbates the need for such formal information. The long sequence of technical processes and economic activity from 'farm to fork' effectively prevents any direct communication between household consumer and farm producer, and hence there is a clear need for a dependable framework to deliver the information and assurance that consumers seek but cannot gain for themselves.
- 20. The structure of the modern food supply chain and the links between its various components can be summarised by the following simple diagram. This highlights the need for information to be passed at each stage from supplier to buyer, and to be carried forward so that the interested final consumer can be informed of the provenance of the final product. Consumer concerns and preferences about the food they eat may create a need for information relating back to aspects in the agricultural supply sector (e.g. hormones, drug

residues), with on-farm characteristics of the production process (e.g. free range, organic), the method of slaughter, food safety aspects, up to the nature of the final purchased product (e.g. food constituents, nutritional values). It is the role of assurance to provide that information and so allow consumers to better satisfy their specific preferences when making purchasing choices.



Exports of agricultural products and processed food also take place but are not directly relevant in the current context

- 21. It is possible to identify three different groups in the food supply chain for whom farm assurance is either necessary or at least of some value. First, assurance structures are of benefit to farmers to gain credibility for the production process, to inspire buyer confidence, and to both gain and retain a dependable market for farm output. Secondly, farm assurance and traceability are essential at the level of both food processor and food retailer, so that they can meet their legal responsibilities and to ensure that the quality standards they wish to be associated with their products can be validly claimed and demonstrated. Finally farm assurance is desired by those consumers (not all, by any means, but an increasing number) who have a specific focus on food supply issues.
- 22. At all stages throughout the food chain information relating to farm assurance satisfies the requirement that the supplier (farmer, processor or retailer) can be shown to be meeting particular needs of the buyer (retailer, food service sector or household consumer).

# Part III: ACCREDITATION AND CERTIFICATION

#### Role of UKAS

23. Assurance provided by suppliers as to the quality and provenance of their product has no great merit unless independently verified and certified. Hence all credible assurance schemes need to be backed by a reliable framework of accreditation and certification. The United Kingdom Accreditation Service (UKAS) is the sole accreditation body recognised by Government to assess and accredit the competence, integrity and impartiality of independent evaluation by certification and inspection bodies. Once accredited these evaluating bodies are monitored annually and re-assessed every four years. There are two European standards relevant to farm assurance. The first is EN 45011 (Product Certification Standard) which confirms that an organisation is competent to certify to a specified set of criteria as defined in a given technical standard; and the second is the Inspection Standard, EN 45004. The latter provides assurance of compliance with the standards at a given point in time, whilst the former provides assurance that there are systems in place to ensure continuing compliance with the requisite standards.

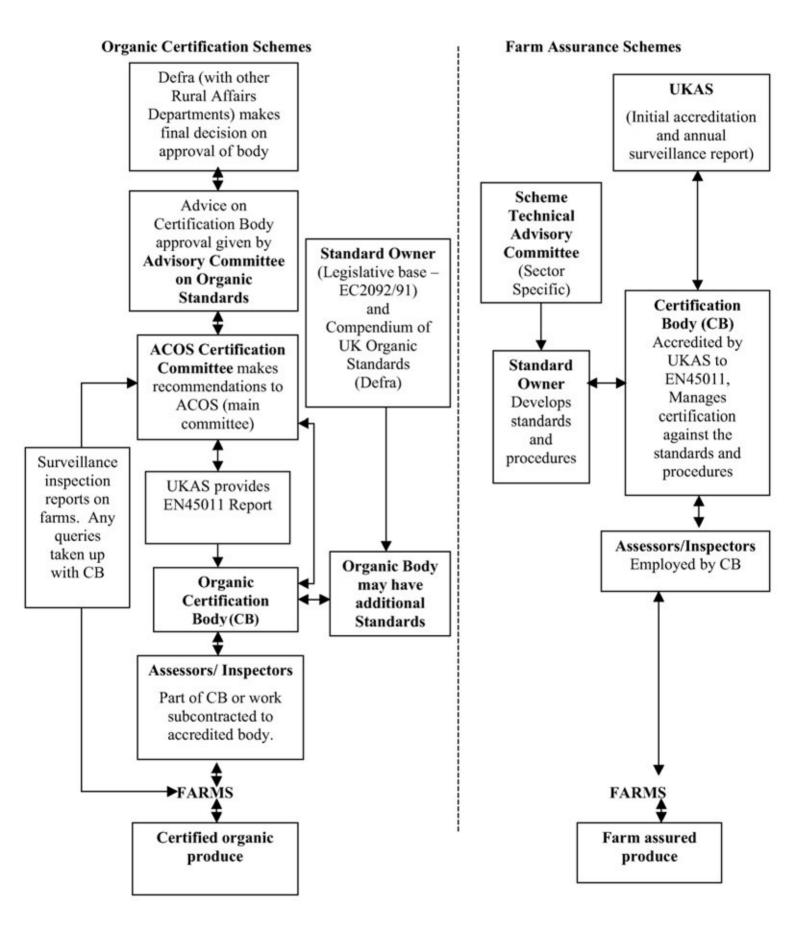
#### Accreditation of certification bodies

- 24. Currently UK accreditation to EN 45011 is held by eight certification bodies in respect of various livestock products: EFSIS Certification Ltd (European Food Safety Inspection Service); PAI (Product Authentication Inspectorate); SFQC (Scottish Food Quality Certification Ltd); CMi Certification (Checkmate International formerly known as UKFQC); QWFCL (Quality Welsh Food Certification Ltd); Northern Ireland Food Chain Certification; Soil Association Certification Ltd; and the Organic Food Federation. Two Farm Inspection bodies Integra Food Secure Ltd and FIS (Farm Inspection Services) are also accredited, but to EN 45004.
- 25. When certification bodies are assessed by UKAS against the requirements of the accreditation standard, the main areas investigated include the following:
- the stated aims of the scheme;
- whether the scheme was capable of delivering the stated aims;
- whether relevant interested parties had been given the opportunity of contributing to the scheme;
- the balance of interests represented in the scheme 'structure';
- the stakeholders in the scheme;
- whether the scheme incorporated the basic legislative requirements;
- whether the scheme owners had considered recognised 'best practice' and, where relevant, that it was incorporated into the scheme;
- if 'best practice' had been considered but not incorporated, the rationale for omitting it;
- how the certification body was proposing to 'deliver' the scheme if this was not prescribed by the scheme.
- 26. Certification is a global industry and bodies similar to UKAS exist in most developed economies. UKAS is recognised internationally through European and world-wide multilateral recognition agreements, licensed to use accreditation marks featuring the Royal

Crown and to sub-license the use of these marks to UKAS accredited organisations. The existence of a world-wide accreditation system responsible for the independent evaluation of certification and inspection bodies used by farm assurance schemes provides assurance to customers that the evaluators of the assessment process have been judged against rigorous standards and found to be worthy of the trust placed in them. The use of UKAS accredited certification and inspection bodies by scheme providers therefore provides endorsement at the top of the hierarchy that third party evaluation to a given standard is assured and that equivalence at this level is available in the majority of the industrialised countries.

- 27. In the organic sector, eight out of the ten Defra-approved certification bodies are either accredited to EN45011, or in the process of achieving accreditation. Two have received an assessment of their compliance with EN45011. This reflects the fact that the regulation governing organic food and farming specifies "compliance with" EN45011 rather than accreditation as a minimum requirement. Where a body has not applied for accreditation, it is assessed by UKAS who examine the body for compliance. Whether accreditation or assessment is involved, the process is that the Advisory Committee on Organic Standards (ACOS) Certification Committee consider the UKAS recommendation in conjunction with the surveillance reports prepared by consultants on behalf of Defra. If satisfactory, ACOS will recommend that Ministers approve the certification body which is then placed on an 'approved list' to undertake organic certification, subject to continued annual surveillance and a four yearly re-assessment by UKAS.
- 28. In the two cases where assessment of the organic certification body is provided by UKAS, this is effectively an assessment of the office system and does not include a witness assessment of the auditors/ inspectors. Therefore UKAS are not required to provide confirmation that the inspectors of the organic certification bodies on the approved list are competent to perform their job. However, this element is taken care of by the Defra/ACOS process that includes surveillance inspection to check on the competence of the inspections made by the certifiers and a process of interview and approval of inspectors.

29. The figure below shows the interaction between accreditation, certification and assessment/inspection in relation to farm assurance and organic certification schemes.



# **Standard Setting in Farm Assurance**

- 30. Those who operate farm assurance schemes are responsible for setting the specific standards applied in their scheme and are encouraged to encompass the whole livestock production chain including on farm, transport, markets and abattoirs. The standards are then licensed to various certification bodies that inspect and certify against those standards. The standards themselves are kept under review by that scheme's Technical Advisory Committee (TAC), which has the task of effecting improvements considered desirable and which the industry is able to assimilate. The role of the TAC is therefore crucial in maintaining the acceptability of the product to the purchaser and in ensuring flexibility and adaptation in the face of new knowledge over time.
- 31. We consider that regular communication between scheme providers, UKAS and the responsible Government Department on the interpretation and detail of legislation is particularly important to ensure that scheme standards remain dynamic and responsive to changes. Furthermore, purchasers can gain assurance in any real sense only if the standards are clear, understandable and openly available. In this sense it is obvious that 'assurance' is necessarily something conveyed by information, and not simply the existence of some background process.

# **Recommendations**

- 32. FAWC recommends scheme owners should ensure that their Technical Advisory Committees have the necessary knowledge, skills, balance of interests, scientific guidance and independent advice on animal welfare to ensure that their standards embody appropriate, enforceable requirements in relation to the welfare of farm livestock.
- 33. FAWC also recommends that scheme owners ensure a mechanism is in place for initiating and implementing changes in standards, and that this process is clear and transparent.

# Supply side and demand side schemes

- 34. During the evolution of Farm Assurance Schemes there was at the outset a proliferation of 'demand side' assurance schemes led by the retailers, which specified required production conditions back down the chain to farmers. These were orientated towards enabling retailers to specify their own standards (often as an element of branding) and establishing conditions of supply they wished farmers and processors to meet. With the advent and growth of national producer-led schemes, (see below) the assurance market is now dominated by 'supply side' schemes, with only a few retailers continuing to provide their own schemes. This trend is likely to lead to less diversity, possibly less incentive for innovation and could lead to a lack of dynamism or improvement in standards over time; however, such growing uniformity does have the advantage of generating greater cost and operating efficiency, economies of scale, consistency and accessibility and less potentially confusing diversity for the consumer.
- 35. There has been a growing emphasis on compliance with environmental criteria in farm assurance schemes. This focus is underpinned by June 2003 CAP Reform agreement, whereby the inspection and enforcement of environmental compliance will form a condition for receiving the new single farm payment which commenced in January 2005. There will

be an equivalent cross-compliance regime for animal welfare, but it will not start until 2007. We have some concerns that this delay could imply that animal welfare is a less important aspect of farm production requirements and might lead to a reduced emphasis being placed on the welfare component of farm assurance schemes. FAWC believes that, if farming is to be supported on the grounds of its qualitative contribution to the countryside, then good animal welfare is as important as environmental care as a component of 'good agricultural practice'.

#### **National Farm Assurance Schemes**

- 36. The majority of producer-led assurance schemes in England now operate under the umbrella of AFS. Four national livestock schemes are now part of the AFS structure. These schemes are:
- Assured British Meat (ABM);
- National Dairy Farm Assured Scheme (NDFAS);
- Assured Chicken Production (ACP);
- Assured British Pigs (ABP).
- 37. A number of other schemes outside of this framework are recognised by AFS. Livestock products assured under these schemes have access to the Red Tractor mark. These include the Farm Assured Welsh Livestock (FAWL); Quality Meat Scotland (QMS) and Northern Irish Farm Quality Assurance Scheme (NIFQAS). Recognition of 'equivalence' also extends to Genesis Quality Assurance (Livestock modules for beef/lamb, pigs and dairy), Soil Association and Scottish Organic Producers' Association (SOPA) (Farm Assured modules).
- 38. AFS is now owned by the whole food chain and governed by a board of directors including an independent expert on animal welfare. It has a corporate structure with five main components:
- an Ownership Body to exercise the food chain "shareholder" function;
- a *Board* to take responsibility for delivery and governance;
- Standard Setting Bodies to maintain, review and update Red Tractor standards and to maintain links with industry sectors;
- a Standards Committee to resolve and make proposals on technical issues; and
- a *Stakeholder Forum*, meeting up to twice a year, to involve all stakeholders (food and non-food chain) in progressing, promoting and building confidence in assurance.
- 39. Assured British Meat (ABM) is responsible for setting the Red Tractor beef and lamb assurance standards at farm level in association with the beef and lamb assurance schemes. It is also responsible for setting standards throughout the food chain up to the point of slaughter (in transit, at markets and at slaughter) working as the Beef and Lamb sector Board within AFS. ABM's remit is to maintain and develop credible standards within the red meat industry covering food safety, animal welfare and environmental protection and to promote integrated beef and lamb assurance.

- 40. QMS is a levy funded organisation set up to improve the efficiency of the red meat industry across Scotland. It was created in 2003 by bringing together four previous organisations in Scotland: Meat and Livestock Commission; Scottish Quality Beef and Lamb Association (promotion and assurance for cattle and sheep); Scottish Pig Industry Initiative (promotion and assurance for pigs); and Guild of Scotch Quality Meat Suppliers (concerned with promotion and assurance for meat processors). QMS see their four main areas of activity as marketing, industry development, information and communications, and consumer assurance.
- 41. QMS operates six EN45011 accredited assurance schemes. All schemes have equivalence with AFS allowing use of the Red Tractor logo:
- QMS Farm Assurance- Cattle and Sheep;
- QMS Farm Assurance- Pigs;
- QMS Auction Market Assurance;
- QMS Haulage Assurance;
- QMS Feeds Assurance;
- OMS Processor Assurance.
- 42. Most schemes in Great Britain are now well established and encompass the large majority of output in chicken, dairy and pig production (including beef cattle and sheep production in Scotland). Similar schemes covering beef cattle and sheep in England and Wales are also well established but the proportions are less, (approximately 80% and 60% of output respectively in England and 70% of output for both beef and sheep in Wales).
- 43. Of all the schemes currently operating it is Freedom Food, the RSPCA's farm assurance and food labelling scheme, that is most explicitly focussed on assuring the welfare of farm animals. It was introduced with the clear aim of improving the lives of as many farm animals as possible. There are detailed welfare standards separately for each species of livestock, which apply to both indoor and outdoor systems and are integrated across the food chain. Furthermore, they apply from birth to point of slaughter, and we believe this clarity and coverage is an important objective.

#### Recommendation

44. FAWC recommends that all scheme owners should be working towards meeting the principle that all animals sold as 'farm assured' should have met the assurance requirements throughout their life, from birth to slaughter.

# **Eurepgap**

45. Eurepgap has more recently emerged on the scene providing a wide framework of assurance standards for the food sector. It represents a global partnership between retailers, processors and producers, and has recently finalised livestock assurance standards. We understand that Eurepgap aims to provide a widely accessible scheme to serve the whole food chain from wherever products are sourced; a crucial component of its intention is to operate a benchmarking exercise to verify different schemes from around the world as being equivalent to its standard. Certification bodies using Eurepgap standards can certify producers,

or established national schemes can apply for formal benchmarking against Eurepgap. Our understanding of the Eurepgap standards is that they will be operational largely at the farm level without any evident integration along the supply chain either before or after the farmgate. If this is the case, it has a somewhat limited focus for a scheme, which as stated above, is a partnership between retailers, processors and producers and aiming to serve the whole food chain.

46. There is concern that Eurepgap standards may come to represent a universally accepted floor level which is convenient for retailers and processors to accept, with the potential to dominate the market and drive out schemes with higher and more integrated standards. We are also concerned that such large schemes may be unresponsive to pressure for changes over time. Moreover, it is important that all interested parties are able to compare them against Red Tractor standards as to the content of the animal welfare component and the rigour of the audit protocol.

#### Recommendation

47. FAWC recommends that both national and international scheme owners should be in a position to provide clear information on the coverage of their standards so that it is evident whether or not there is any equivalence between the different standards.

# **Equivalence**

- 48. For the purpose of this report we see 'equivalence' of standards as satisfying a common objective and achieving 'mutual recognition' by convergence at a given point and ensuring comparability even though detailed specifications may be different. In effect 'equivalent' schemes should operate in a comparable manner and achieve equally acceptable welfare outcomes.
- 49. A framework for establishing equivalence protocols and mutual recognition agreements becomes particularly important as the farm assurance market continues to grow and the standard owners and certification bodies continue to increase. Equivalence can exist at many levels: equivalence between schemes under one umbrella; equivalence with modules of other schemes in the same country; equivalence with schemes in other EU countries and schemes outside the EU. In addition, equivalence can exist at the level of the standards only, or extend to equivalence of inspection and compliance, particularly the procedure and rigour with which non-compliances are treated.
- 50. We believe that equivalence arrangements between the various schemes in relation to animal welfare should extend to the standards, operational rules, and audit/inspection protocols. The procedure for assessing such equivalence and establishing systems of mutual recognition should be clear and transparent. It is also essential that equivalence is maintained over time. Quality controls should be in place to ensure that any changes in core standards and protocols are adopted.

#### Recommendation

51. FAWC recommends that equivalence arrangements and systems of mutual recognition in terms of welfare are clear and transparent, with equivalence of standards as well as equivalence of inspection and enforcement, and that these arrangements are regularly reviewed. It is particularly important that assurance schemes operated in other EU Member States and in countries outside the EU can demonstrate their equivalence to UK schemes.

# **World Organisation for Animal Health (OIE)**

52. The Office International des Epizooties (OIE) was created in 1924 with a role to monitor and control the spread of diseases across countries. It is now referred to as the World Organisation for Animal Health and currently 166 countries are members. Given the close links between animal health and animal welfare OIE has also become the international reference organisation for animal protection. Its five year work plan (2001-2005) includes the objective of establishing international welfare standards, and a global conference for animal welfare was held in February 2004 which brought together parties from around the world to pursue this objective. FAWC warmly welcomes this initiative, which will enable the development of a global framework of rules for animal welfare. The OIE has convened a group of internationally recognised experts on animal welfare to form the animal welfare working group, which will be providing guidance to the OIE on global welfare standards. Work has commenced on drafting guidelines on sea and air transport, on killing for human consumption, and for disease control.

#### WTO and animal welfare

The World Trade Organisation (WTO) was formed in 1995 to enforce the rules established in the Uruguay Round of negotiations under the then General Agreement on Tariffs and Trade (GATT). The prohibition of imports of livestock products solely on animal welfare grounds is not permitted under current rules. Under the accepted Sanitary and Phytosanitory (SPS) measures restrictions can be applied only where there is a threat to human, animal or plant health in the importing county. The EU, supported by the UK, has pressed for animal welfare measures to be on the agenda for the current negotiations on a new WTO Agreement on Agriculture. However, developing countries in particular fear that animal welfare standards will be used by developed countries as an excuse for protecting their own livestock producers. FAWC considers that these fears are unfounded if welfare requirements on imported produce are equivalent to those imposed on domestic livestock producers. We believe greater effort should be taken during such discussions to stress that animal welfare considerations emerge from consumer (moral) concerns, not from concerns regarding trade protection. In a demand driven global economy, the purpose of trade is to satisfy consumer demands and preference more effectively and as cheaply as possible. The argument that animal welfare standards are an 'affluent' requirement, which discriminates against livestock producers in developing countries, cannot be sustained. Indeed, developing countries may well have inherent competitive advantage in terms of labour costs, climate, resource quality etc and with adequate assurance standards and procedures could well meet the demands of UK food suppliers and consumers. There is a stark inconsistency in allowing trade conditions to be imposed to meet a society's preference for healthy plants and animals but not its preference for ensuring minimum levels of wellbeing for animals that are recognised as sentient beings.

#### Recommendation

54. FAWC recommends that the Government should seek, during WTO talks, to ensure that minimum welfare standards are allowed as a condition attached to trade in livestock products on the basis that quality standards exist to benefit consumers, not to protect producers.

# The EU Rural Development Regulations

As we have mentioned earlier, the Rural Development Programme appears to be the main area where the reformed CAP could have a directly beneficial impact on animal welfare. However, animal welfare is explicitly mentioned only under 'land management' – one of the four criteria for funding – which means that animal welfare has to compete with other contenders in this category such as the environmental schemes. Current provisions under the Rural Development Regulations (RDR) which allow payment to farmers for levels of animal welfare that go beyond normal standards have not been taken up in England, where available resources are directed towards Environmental Stewardship (the position in Scotland and Wales has been referred to in paragraph 10). In addition, there are opportunities to use grants for farm improvements and training schemes to benefit animal welfare which have been taken up in Scotland and Wales. Proposals for the RDR (2007-2013) provide further opportunities for direct payments to farmers to promote good animal welfare through two channels: payments to meet new minimum community and national standards and payments for animal welfare commitments that go beyond cross-compliance requirements. The European Commission is considering the option of making payments for meeting welfare standards above the minimum a compulsory element of Member States' Rural Development Plans. Such a move would increase the profile of animal welfare and encourage the enhancement of the welfare component in Farm Assurance. However, if this Commission initiative is not successful and the option is taken up by only some countries, it will simply add to existing inequalities in our overall food supply system.

#### Recommendation

56. FAWC recommends that the Government should use the opportunities presented in the proposed Rural Development Regulation to sustain and promote good animal welfare thereby reinforcing its commitment to the concept of partnership established in the Animal Health and Welfare Strategy.

# Part IV: ASSESSMENT /AUDIT OF ANIMAL WELFARE

#### Conventional assessment

- 57. The typical approach to the assessment of welfare in farm assurance schemes has been to focus on the presumed determinants of welfare based on the Five Freedoms. Such an 'input based' approach essentially attempts to infer the welfare status of the animals from the resources and husbandry practices that go into livestock farming. For this approach to be effective the 'inputs' considered need to cover a wide range of individual features of the production system, and should encompass the following areas: the animal (genetics/rearing conditions); husbandry (including stockmanship), housing, hygiene, biosecurity, health and welfare plans, records and training. Examples of inputs include:
- adequacy of rations to maintain physical condition appropriate to the season;
- appropriateness and quality of physical environment and housing facilities;
- quality of litter and bedding;
- adequacy of dry and sheltered areas for free-range animals;
- group size and stocking density;
- disease treatment and health management actions.
- 58. It is natural that assurance scheme standards tend to major in these areas given that such characteristics or criteria are clear cut and identifiable. Moreover, it is relatively easy to devise an accompanying inspection protocol which is of the 'tick-box' variety and can be audited within a relatively short period of time. In many cases such an audit can be conducted without even the need to observe and assess the state of the animals on-farm. Schemes, which are focused largely on assessing inputs to welfare are not in a position to assess if the desired welfare outcomes are being realised, and it needs to be stressed that welfare assurance cannot be confirmed unless the animals themselves are inspected.

# **Animal-based parameters**

- 59. Assessing animal welfare as an outcome of husbandry practice, focussing on animal based parameters rather than management inputs, is difficult to undertake in a valid and reliable manner. However, such measures are, in principle, more relevant indicators of welfare because they focus directly on the animals rather than indirectly on the factors that influence the welfare of animals. A basic requirement in assessing the welfare conditions in a livestock enterprise is that the animals themselves should be inspected, including the outlying stock. The time spent on the inspection should be sufficient to obtain an overall view of the whole livestock enterprise in order to provide indicators of health, welfare, stockmanship and systems to ensure the maintenance of welfare. The management protocols in the health and welfare plan should serve to re-inforce initial impressions. Examples of aspects of welfare outcomes that should be specifically looked for include:
- physical state of animals fitness, condition;
- behaviour reflecting good welfare (e.g. social grooming, play);
- animal temperament, flight distances, aggression/bullying;
- injurious behaviours (e.g. feather pecking, tail biting);

- behaviours reflecting poor welfare (e.g. stereotypic behaviour, distress vocalisations, indications of listlessness);
- cleanliness of animals;
- evidence of pain, injury and disease, (lameness, mastitis, visible injuries, ectoparasitic infestation);
- mortality levels and culling percentages.
- 60. It is recognised that there is an obvious element of judgement associated with interpretation of the leading welfare indicators when it comes to assessment. Assessors must be skilled, trained and competent to assess the physical and mental wellbeing of the animals as well as being able to interpret the outcome of welfare planning and the associated records. All assessors should have knowledge and practical experience in the production system as well as carrying out the relevant audit skills. In addition, assessors should have the appropriate personality traits to enable them to engage with farmers and stockmen so as to effectively undertake the verification process in relation to animal welfare. There should be a requirement for continued professional development (CPD) for assessors.
- 61. The RSPCA and Bristol University have pioneered the incorporation of animal based welfare assessment techniques into farming systems by assessing the impact of the Freedom Food Scheme in terms of welfare outcomes. We are pleased to note that Bristol University will also be working with Soil Association Certification Ltd on the implementation of a welfare assessment system to support certification decisions by assessing the welfare outcomes on organic farms.

### Recommendations

- 62. FAWC recommends that scheme owners should work towards refining their standards and inspection procedures to achieve an increasing inclusion of welfare outcomes, so as to provide both a better reflection of the welfare of the animals within a production system and the level of stockmanship on the farm.
- 63. FAWC recommends that certification bodies should ensure that assessors possess the knowledge, skills and competencies in livestock husbandry as well as in audit procedures, and possess the ability to observe, question and judge the level of animal welfare.

#### Evolution of science-based animal welfare assessment

- 64. As we have already asserted, the Five Freedoms provide a valuable framework of principles to consider when observing animals and assessing welfare. However, it is recognised that a robust audit of welfare using animal-based parameters will be difficult without appropriate weightings attached to the various components; what is needed, ideally, is the formulation of some overall animal welfare index, which at least guides the ranking of relative welfare states. This would help assessors to establish levels of specified welfare conditions for the purpose of comparisons between farms (benchmarking) and give scheme owners the opportunity of giving feedback to the producers concerned.
- 65. A summary of the evolution of science-based animal welfare assessment and current developments in this area are contained in Appendix A of this report. Much of the current

research on developing scientific approaches for on-farm assessment is now co-ordinated under a major EU research programme entitled "Welfare Quality" and we await its findings with interest. Research in this area is at a relatively early stage of development, however, and is still some way from offering the kind of measures of animal welfare that are desirable.

66. From the point of view of farm assurance schemes, the objective must be to assess the overall standard of animal welfare in the production processes in terms of both key inputs and outputs as accurately as possible within the practical constraints of limited time and cost, and the periodic nature of the inspections. Such measures need to be demonstrably valid, reliable and reproducible, and to measure welfare directly rather than by assumption. This should provide a greater degree of consistency of audit assessment across farms and facilitate 'benchmarking' and the provision of feedback to producers.

#### Recommendation

- 67. FAWC recommends that research into welfare assessment should focus on:
- (a) Methodologies for measuring key inputs and outputs that affect and reflect animal welfare including behavioural measures relevant to assessment of animals' mental health and measures that provide integrative assessments of welfare.
- (b) Validation of all measures used as welfare assessment tools.
- (c) Analysis of the relationships between welfare inputs and outputs with a view to integrating these measures into a welfare index where research indicates this to be appropriate.
- (d) Collaborative research including producers, to promote the skills and methods necessary to enable farmers to make continuous assessments of the health and welfare of their stock.

# **Audit/Inspection Protocol**

- 68. The rigour and consistency of the audit inspection are critical in determining whether an assurance scheme delivers the stipulated standards. During a visit the inspection checklist produced by the scheme provider is used in conjunction with guidance notes which give inspectors examples of what to look for, including objective evidence and an indication of how the standard should be assessed (for example by visual inspection). In some cases this may be relatively simple such as checking the contents of the medicine store and treatments recorded in the medicine book against the company's list of approved drugs. At the other end of the spectrum we note that the management and stockmanship standard can be assessed throughout the inspection rather than by direct questioning about education, training and experience.
- 69. When looking at the guidance for auditors and the checklists provided by schemes, it is notable that the examples of objective evidence to look for are few and far between. We believe that scheme owners should direct more attention to ways of promoting an evidence based approach. In the meantime, the robustness of the audit is largely dependent on the assessor's diligence, knowledge and experience in relation to the production system as well as his/her audit expertise and the time available for inspection.

- 70. The checklists filled by the inspector records compliances or non-compliances. The specific standards where non-compliance will not lead to the automatic refusal or withdrawal of certification should be clearly distinguished from those standards that must be met in full at all times for certification to be retained. What is not evident from checking the documentation is the weighting given to individual non-compliances that may be observed, or the formula that would lead to a decision that certification should be refused to a new applicant. This is a very important consideration. Unless compliance requirements are unequivocal and rigorously enforced, and non-compliances treated within a clear cut framework for action with the imposition of sanctions where remedial action is not forthcoming, the delivery of 'assurance' is unconvincing and unreliable. With increasing competition between certification bodies advocated by AFS (but not QMS) consistency of approach on the treatment of non-compliance becomes even more important.
- 71. A checklist based inspection carried out by an 'expert' remains the best that the schemes can currently offer in terms of assessing the welfare component in their assurance procedures. Such a system accompanied by carefully drawn up inspector guidance can provide a common interpretation of standards across a scheme but is heavily dependent on the competency and training of the assessors. However, in an ideal world only a welfare assessment system that culminates in an index can provide the trade-off between the various positive and negative welfare impacts of the production system and this is not available at present. It is nonetheless important that emphasis is placed on the observation and recording of information that would go into an index if it were available. A skilled and experienced judgement based on this information, rigorously evaluated, would still provide an evidence-based assessment of animal welfare.
- 72. It is worth comparing this method of inspection with that used by the SVS in relation to on-farm welfare inspections, which include inspection of records, the environment and animals along with clinical examination when required. SVS inspections are therefore based on a combination of 'resource-based' measures and specific welfare assessment methods using condition scoring, lameness scores, forensic pathology and photo/video recordings. The results of the SVS inspection fall into a four point scoring system:
- full compliance with both legislation and codes;
- compliance with legislation but not codes;
- non-compliance with legislation;
- unnecessary pain, unnecessary distress (UPUD) this representing a clear breach of the 1968 Act.
- 73. One of the reactions we received on publication of our Interim Report was that farm assurance was unsatisfactory if it was based on no more than meeting the minimum legal welfare requirements. In its recommendation to the Policy Commission on the Future of Farming and Food, FAWC recommended that full compliance with the welfare codes should be the target for baseline farm assurance schemes. This was endorsed by the Policy Commission, along with a recommendation that Assured Food Standards (AFS) should review its welfare standards with this in mind. We strongly urge AFS, QMS and all other scheme owners to ensure that their quality mark equates with full compliance with legislation and codes. In particular, we believe that inspector guidance should be clarified to make the presence of Unnecessary Pain and Unnecessary Distress (UPUD) a major non-

compliance carrying serious consequences. We say this in the light of the findings by the SVS of instances of UPUD on farms that were farm assured. This might have been due to accident or extenuating circumstances rather than neglect, but it is nevertheless a matter that causes us great concern.

# Recommendations

- 74. FAWC recommends the provision of more detailed inspector guidance relating to the assessment of animal welfare, with clear indicators of 'acceptable' and 'unacceptable' welfare. The presence of any UPUD should be classified as a major non-compliance with consequent immediate action required or sanctions imposed.
- 75. FAWC recommends that all scheme standards should have a consistent, documented and transparent approach to the treatment of non-compliances in relation to animal welfare.

# Part V: SUPPLY SIDE ISSUES IN FARM ASSURANCE

- 76. The actual assurance that a product carries concerning its provenance and quality characteristics must originate back in the supply chain, and the evidence that particular conditions have been satisfied must be available at source (it cannot meaningfully be created only at the end of the supply chain). This is why, in relation to interest in the farm level conditions of livestock products, so much attention must be paid to standard setting and inspection of the animal production system, with clear records maintained and verification to back up claims. Furthermore, the assurance process needs to be complete and continuous throughout the supply chain; welfare assurance is not satisfied, for example, if farm level husbandry can be shown to have been excellent but no information is available, post farm gate as to whether animal transport and slaughter were undertaken in line with required standards. Thus, whatever the motivation for food products to be assured, it requires action and commitment on the part of the supply side participants in the food chain. Producers at each stage must sign up to the concept of assurance, take ownership of the objectives, and adapt their activities so as to supply consciously the assurance as an integral component of that product.
- 77. From the standpoint of the livestock producer, the essence of farm assurance is that it offers to the buyer a guarantee that particular, defined quality characteristics are satisfied. The assurance designation indicates that there is verification that the farmer has followed set procedures relating to the conduct of his farming system and the way the animals have been treated, and has specifically paid attention to aspects of husbandry and management to ensure good animal welfare outcomes. In this sense assurance removes any uncertainty that may exist and provides formal confirmation that the product has a background and embodies characteristics that cannot otherwise be ascertained by the buyer and so would have to be taken on trust. In many respects therefore, the assured producer is declaring and confirming on inspection that his treatment of the animals throughout their life fully meets the standards that the buyer (or final consumer) has a right to expect.

# Producer attitudes and issues

- 78. As those who offer (or are required) to provide assurance about the farm level conditions of production, it is instructive to note the views and attitudes of livestock producers to the various schemes in force. When farm assurance was first introduced it was argued that scheme membership would confer product distinction and so yield a marketing advantage to producers, but over time as participation has become more widespread this expectation may have lost some of its force. In order to gain some idea of how farmers currently view the farm assurance scene we conducted a survey by postal questionnaire sent to a wide range of livestock producers. The detailed findings are summarised in Appendix B to this report, but the key points are worth noting here.
- 79. Four out of five respondents in the survey were members of an assurance scheme, the minority who had not joined declaring they saw no advantage, considering it too costly or believing their output was too small to warrant it. Of those respondents who were scheme members, a very large proportion claimed they had no option but to join, it being a requirement of their supply/marketing arrangements. Others had joined in expectation of

gaining advantages of market access or a premium price. For many, participation had been a largely costless exercise, causing them to incur no, or only relatively minor, additional expenditure; however, in the event few felt they had gained much in the way of benefit either. Most producers claimed they had not changed the way they kept their livestock. In general, farmers tended to believe that farm assurance was a response to 'external influences', resulting in little real cost or benefit and having minimal impact on animal welfare.

80. While the 'average' reaction to the farm assurance system was perhaps less than wholeheartedly enthusiastic, there were clear indications from many survey respondents, and from individual farmers we spoke to during our study, that the inherent merits of the schemes were accepted and appreciated. Producers recognised their essential role was to meet their customers' requirements and that assurance provided the means to demonstrate the quality of their product. Many declared their acceptance of the objectives, genuinely believed in the standards required and gained satisfaction in producing to those standards. As agriculture adapts to the new market-orientated environment it is these attitudes which provide the leadership for development of farm assurance from within the production sector, and it is expected that they will increasingly become the norm among commercially successful livestock farmers.

# Stockmanship

- 81. The vital role played by the stockman in maintaining and enhancing animal welfare has long been recognised by Council, and a FAWC study is currently reviewing this subject in some detail. There is a general consensus that stockmanship is perhaps the single most important factor in ensuring the welfare of farm animals, and for the purpose of farm assurance the challenge is to find a method of objectively assessing the quality of stockmanship. Finding satisfactory ways of assessing the competency of stockmanship should be a priority for all scheme owners.
- 82. The stockman is the main agent responsible for maintaining the level of animal welfare on a continuing basis, and welfare will be assured only if those husbandry skills and caring management are practised at all times; however, there is no simple mechanism for testing the quality of stockmanship during an inspection that lasts only a few hours. Verification of practical ability may be partly based on a visual inspection, as well as an assessment of the animals' general wellbeing. Observations of the animals' behaviour, such as approach and avoidance and other behaviours indicative of fear and distress or general comfort and harmony with the environment, should also be taken into account. Assessment should also be made of the stockman's ability to recognise welfare-related problems and devise and implement remedial treatment. The importance of herd/flock health and welfare planning as an integral element of good stockmanship practice is covered in the next section. Examination of these plans along with the medicine book and training records of the stockman, and most importantly the assessment of the animals, can provide a reasonable indication of the overall level of stockmanship on the farm.

#### Recommendation

83. FAWC recommends that Technical Advisory Committees place more emphasis on developing better methods of assessing the abilities of stockmen to assess animal welfare, based on the way that they interact with animals and the demonstration of vision and ability to foresee problems and take appropriate action (the latter should be linked with the preparation of detailed health and welfare plans).

# Herd/flock health and welfare planning

- 84. As one of the input measures to be considered in seeking welfare assurance, we believe that a sound herd/flock health and welfare plan and its implementation is essential to guarantee acceptable welfare. The Animal Health and Welfare Strategy announced in June 2004 emphasised the need to improve on-farm assessment of risks and forward planning for livestock health and welfare. Council supports the promotion of herd and flock health planning but is concerned to ensure that aspects of welfare other than animal health are not overlooked. Whilst health is an important component of welfare it is not the only one and healthy animals can exhibit poor welfare. The emphasis should be placed on promoting herd/flock health and welfare planning in order to protect the overall wellbeing of animals as much as protecting their physical health.
- 85. The existing herd/flock health plan in most farm assurance schemes is a simple document which acts as an aide memoire for producers to take certain actions at given points in the production cycle. At its most basic it would be simply a table showing for each month of the year the specific health management actions (e.g. vaccination, worming, inspections, recording) that have been planned. In addition, it would indicate when particular risks may be faced (e.g. fly strike, milk fever) and how to prevent them. The plan should also record the herd/flock action that should be put in place if an event occurs and contain space to record the action that was taken.
- 86. In general, herd health plans provide specific guidance on basic health care, create a system of monitoring health and welfare, and an assessment of husbandry and management practices. A herd health plan can be created or tailored using a model or templates, or can be based on specifications laid down by the scheme.
- 87. Some schemes require that health and welfare plans are created and structured for each farm specifically in conjunction with a veterinary surgeon, though in other cases this is only a recommendation. In general, once a plan is established herd health policies, isolation facilities and records of the uses of medicines are reviewed and documented. The veterinarian would then issue a signed and dated 'Certificate of conformity', which indicates that the plan is compliant with the relevant sections of the standards and set a date for review of the plans.
- 88. The objectives of health and welfare planning should be to raise health and welfare standards to agreed levels; reduce risk of disease outbreaks; improve biosecurity; foster a better understanding of disease status; encourage good husbandry and to be responsive to the emergence of particular welfare challenges.

- 89. FAWC believes that an effective herd/flock health plan should encompass the following:
- (a) identify the farm and the animals to which the plan refers;
- (b) identify the people that are responsible and confirm that they are suitably trained and competent;
- (c) identify the current health and welfare threats/challenges of the enterprise and assess any future risks to health and welfare;
- (d) set up practical and effective methods for monitoring disease and welfare problems;
- (e) record the treatment received by individual animals or the herd/flock collectively;
- (f) establish that there is responsible use and storage of medicines and ensure that all medicines used on farm animals are recorded and withdrawal periods observed;
- (g) develop action plans that set agreed achievable targets for improvement in the health and welfare status of the animals;
- (h) maintain meaningful records;
- (i) review the plan at regular intervals and assess progress.
- 90. Whilst the primary emphasis in existing plans is on effective disease control, they provide a suitable vehicle for incorporating wider measures to enhance animal wellbeing. which are not necessarily associated with disease prevention. Although professional veterinary involvement in the establishment of health and welfare plans involves an element of additional cost, livestock farmers need to recognise that there are offsetting benefits which follow from improved health and welfare of their animals. Effective welfare planning should enable producers to take careful stock of inherent welfare risks based on previous experience and any changes to the production system. Welfare planning should not be confined to a checklist but should involve an ongoing engagement with the issues a mixture of monitoring events and retaining a reactive capacity based on intelligent consideration of foreseen as well as unforeseen events.
- 91. Overall the welfare element of a health and welfare plan should act as a reminder to producers to consider welfare risks posed on farm at different times of the year, based on past history and enable pre-emptive action to be taken in a timely fashion.

#### Recommendations

- 92. FAWC recommends that scheme owners should emphasise the need for livestock producers to construct a health and welfare plan, and to ensure the maintenance of records needed for the development of such plans.
- 93. FAWC recommends that scheme owners should ensure that schemes specify a requirement for the annual updating of health and welfare plans and for the monitoring of the actions specified in the plans.

# **Integrated Assurance**

94. We have already stressed the importance of assurance spanning the various links in the food chain so that the final product carries with it the assurance regarding welfare standards that the farmed animal experienced. The national assurance schemes have been keen to implement not just farm level requirements but whole chain assurance, and lack of compliance with approved hauliers or the presence of feed additives outside the standard are treated as major non-compliances. We are therefore concerned that harmonisation of farm assurance at EU level or globally should not dilute this important principle.

# Treatment of low value animals

- 95. Animals with a low economic value, such as spent hens, cull cows, ewes and sows, as well as dairy calves are always vulnerable to welfare challenges particularly when market prices are low. The problems associated with the disposal of such animals also vary considerably in different parts of the country and from species to species. We continue to be concerned that not all assurance schemes make sufficient provision to ensure the welfare of cull or casualty animals and we believe this is a major omission that should be remedied.
- 96. FAWC firmly adheres to the principle that the welfare standards appropriate to a particular farm animal species must apply to every individual in that species, regardless of the commercial value or production context. Assurance scheme owners have an important part to play in ensuring that this principle is clearly embedded in their requirements, and that compliance is rigorously observed and enforced.

#### Recommendation

97. FAWC recommends that all farm assurance scheme standards should ensure that there is no distinction between treatment of low value and high value animals and that the appropriate treatment of cull and casualty animals is explicitly specified in the health and welfare plan.

# Part VI: ANIMAL WELFARE IMPLICATIONS OF ORGANIC CERTIFICATION SCHEMES

- 98. Following the FAWC Interim Report which highlighted the need for more detailed consideration of organic livestock producers' input on welfare, it was decided to look into the welfare impact of organic certification schemes in greater detail. In this section of the report we look at the organic standards and their implementation in relation to animal welfare.
- 99. Organic certification is not strictly 'farm assurance' in the conventional sense, though it aims to serve an analogous purpose. However despite this similarity of purpose the interaction between accreditation and certification bodies in the organic sector is distinctly different from farm assurance schemes in general, as is the origin and basis of the standards themselves.
- 100. According to the Defra Organic Action Plan, organic food "...is produced to legally enforceable standards and is subject to tight controls on inputs and an official inspection and accreditation system; it therefore meets demands from an increasing number of consumers for high standards of assurance about production methods; and it requires high standards of animal welfare". In this context the Food Ethics Council has stated that "there seems little doubt that the priority placed by the organic farming regulations on respect for the animals' natural behavioural instincts and for their wellbeing represent a considerably greater respect for their intrinsic nature than many practices in conventional animal agriculture." In February 2005, the Advertising Standards Authority approved the use of a statement that "no system of farming has higher levels of animal welfare standards than organic farms working to Soil Association standards".
- 101. The above statements would seem to argue that organic farming by its very nature leads to higher standards of animal welfare than is generally the case in conventional livestock farming. Against this, based on other considerations some would actually argue the reverse. We consider the basis for this divergence of view in the following paragraphs and comment on the extent to which the organic standards and the certification procedures provide assurance on the welfare standards of animals farmed organically. Our concern is not to enter any debate about the pros and cons of organic farming but solely to assess whether, and to what extent, organic certification of livestock products is equivalent to welfare assurance. The recommendations we make here are intended to contribute to the debate and offer constructive thought on overcoming any potential or perceived impediments to improving animal welfare through the organic accreditation process.

#### **Standards**

102. Standards for organic livestock and livestock products are defined by the European Community Standards (Council Regulation (EC) 1804/1999 augmenting Council Regulation (EEC) 2092/91). These standards define the only farming system that is codified in EU and national law, and regulated by independent certifiers and inspection systems accredited by the Government. Previously, the United Kingdom Register of Organic Food Standards (UKROFS) was responsible for the implementation of the EC Regulation and the standards specific to the UK; it was also responsible for accrediting certification bodies (the 'sector bodies') which inspect organic farms, as well as monitoring and approving their work.

From August 2003 the executive functions previously undertaken by UKROFS passed to Defra - with guidance from a new Advisory Committee on Organic Standards, (ACOS) - while UKAS became responsible for ensuring that organic certification bodies are meeting the EN45011 standard.

- 103. Before this change was made it was argued that because it comprised people with specialist knowledge and experience of the distinctive characteristics of organic production, UKROFS was better able to implement an accreditation and regulatory role than a 'general purpose' body such as UKAS. Against this it was claimed that accreditation is simply a technical process undertaken with reference to basic principles of evaluation and definition of standards, and therefore that 'assessment' does not require direct involvement with the activities being examined. This difference of view appeared to have some validity, since as we have emphasised earlier in this report, the competence and quality of assessors is crucial in assuring that standards are being met.
- 104. Organic farming is characterised by the emphasis placed on the 'farming system' as well as the legal framework of production standards and inspection. Animal manure helps maintain fertility and improve the organic content of soil, thereby enabling the operation of a virtually 'closed system' - an important element of the organic philosophy and one which implies that livestock production is therefore an integral element of organic farming. Because its production methods are less intensive than in much of conventional agriculture. organic production is presumed to deliver high welfare benefits to the animals involved. Our discussions with representatives of the organic sector bodies have confirmed the view that animal welfare considerations are taken to be an integral part of the system, and that good animal welfare is an intended outcome of the way organic farming is practised. The organic regulations themselves do not define specific animal welfare objectives per se or set out detailed welfare criteria. However, they do contain requirements concerning the way animals are kept (covering issues such as housing, stocking densities, feed, transportation of animals and disease management) and it is via the implementation of these requirements (in effect an 'input-orientated approach') that the welfare outcomes of organic farming are determined. These standards are maintained through annual inspections and assessment of all registered organic farms, along with careful examination of their records.
- 105. Although there are no explicit animal welfare criteria it is instructive to look at organic farming methods in terms of the Five Freedoms. The emphasis in the standards on balanced animal nutrition, good housing, low stocking densities, free range production and access to pasture, appropriate breed selection, careful handling, restricted transport times, etc adequately address the freedoms from hunger and thirst, from discomfort, from fear and distress. In respect of freedom to express normal behaviour the organic systems would also seem to offer more than conventional livestock farming. However, it is in relation to the freedom from pain, injury and disease and most specifically from disease that concerns can arise because of the restrictions placed on the use of conventional veterinary medicines in disease prevention and treatment. Much of what follows is focused on this particular aspect.
- 106. Because its methods of livestock production are so specific and in some senses restricted compared with conventional farming the animal welfare aspects of organic farming, particularly in relation to disease management, are a matter of interest in

themselves. We have been told that an objective of organic agriculture is the prevention of disease and sustaining animals in good health by adoption of effective management practices, and that this philosophy is central to organic livestock husbandry. Organic farmers work on the premise that health in farm animals is not simply the absence of disease, but also the ability to resist infection, parasitic attack and metabolic disorders, as well as the ability to overcome injury by rapid healing. The sector claims that this can be achieved by the selection of appropriate breeds or strains of animals, the use of high quality feed, together with regular exercise and access to pasture, encouraging the natural immunological defence of the animal, and ensuring an appropriate density of livestock so as to avoid overstocking and any resulting animal health problems. FAWC shares the concern of those in the veterinary profession who are unconvinced that these claims are always attainable.

107. Some of our reservations in relation to animal welfare were broadly stated in our Interim Report, and we are aware that those comments have been noted by the organic sector. Recently there have been various research enquiries, conferences, meetings and reports which have specifically addressed the welfare aspects of organic livestock production. Leaders in the sector have recognised the potential concerns and are actively considering the means to allay them, and we are pleased that the organic sector is responding to the concerns we voiced.

108. We note that the Soil Association is due to add a new element to its certification standard based on the assessment of animal behaviour and animal welfare. This assessment will link data from the assessment of medicine records, health plans and animal based observations. We welcome the fact that this assessment will extend the time spent by an inspector on observing the animals.

109. The standards stipulate that, in order to maintain their organic credentials, all livestock and livestock products are to be identified at all stages of their production, preparation, transport, marketing and processing. This system was witnessed to operate effectively in transit and at slaughter. It represents a valuable approach to traceability that could have useful application in non-organic systems to guarantee that 'assurance' is linked directly from farm to the final food product.

# Housing

110. Outside access and housing appropriate to animal welfare and behavioural needs are specifically required under the organic standards. Battery cages, tethering, fully slatted floors are prohibited, with the emphasis on free range systems particularly for pig and poultry production, and group housing is a clear principle. Natural bedding is used and the standards specify minimum space allowances for different species. The current UK standards specify that all poultry must have easy access to an outside grazing area, and systems that do not fulfill this requirement, such as barn egg and barn-reared table bird production, are not acceptable. Organic standards aim to ensure that animals are given sufficient space to stand naturally, lie down easily, turn round, groom themselves, assume all natural postures and make all natural movements such as stretching and wing flapping; there are detailed standards stating the requirements for individual livestock categories.

#### Disease control

- 111. FAWC has always recognised that disease is a serious and widespread welfare challenge faced by all farm animals, whether they are reared in organic or conventional systems. The attention paid to avoidance and prevention of disease by means of the overall husbandry system in organic farming is commendable. The organic standards require the nurturing of positive health and vitality to ensure the proper control of disease and the encouragement of positive welfare. However, we feel that equal importance should be placed on the treatment of disease when it does occur and that this should be explicit in the organic standards.
- 112. Organic farmers are required to draw up an animal health plan in order to deliver animal health and welfare within their organic system. It is recommended that such a plan is drawn up under the guidance of a veterinary surgeon, who should stay involved in order to develop and operate a livestock system which conforms to organic standards. The plan aims to ensure the development of a pattern of health building and disease control measures appropriate to the particular circumstances of the individual farm, in theory allowing for the evolution of a farming system progressively less dependent on allopathic veterinary medicinal products. The plan must be submitted to and approved by the certification body as part of the conversion plan for new entrants to the organic sector. Together with a management plan, this constitutes the livestock plan, which must be updated on an annual basis prior to the farm's annual organic inspection.
- 113. The involvement of a veterinary surgeon in drawing up livestock management plans is advocated but not mandatory, and in practice farmers may develop their own plans without taking veterinary advice. Whilst the typical plan provides an overall guiding framework for livestock management, it is clearly very general in nature. It does not appear to provide explicit standards relating to animal health and welfare which can be formally assured in a consistent manner. The standards require that farmers and their staff have access to and are familiar with all FAWC recommendations for the welfare of stock and that the management plan takes account of the Five Freedoms. Yet, we feel that there is a lack of clarity regarding the action to be taken when the health and welfare of animals is compromised that could lead to variable interpretation by different organic producers.
- 114. We are concerned that in the absence of a carefully evaluated strategy which accounts for the limitations and constraints of the individual farm, the restriction within organic production on the use of chemically or biologically synthesised products to assist health management could in certain circumstances put the welfare of organic livestock at risk. This is particularly of concern in the case of 'new entrants' to organic farming, who are having to change their whole approach to livestock husbandry and have not the experience of health management under the more restricted criteria they must now follow.

#### Recommendations

115. FAWC recommends that herd/flock health planning on organic farms should include a disease risk assessment for all classes of animals depending on the past history of the farm as well as disease incidence on neighbouring farms. These plans should be equivalent to the herd/flock health and welfare plans widely advocated in conventional livestock farming and should include an agreed programme to achieve full compliance with the target animal

health and welfare standards. FAWC recommends that there should be an equal emphasis on welfare in the structure of these plans.

116. FAWC recommends that for new entrants to organic livestock farming undergoing the conversion process from conventional livestock production, the health and welfare plan should stand as a centrepiece in the conversion plan, and new producers should receive explicit attention and guidance from their certifying bodies in adapting to the new health management regimes that are required.

#### Parasite control

- 117. Parasitic gastro-enteritis ('worms') can be one of the major causes of ill health, and poor welfare in grazing livestock; it results in gut damage, which leads to mal-absorption of nutrients and eventually, in some cases, to starvation and death.
- 118. The standards recommend that organic farmers operate safe grazing systems as one method to minimise the spread of disease. If followed, this recommendation should ensure that the most susceptible stock (for example young stock with less well developed immunity to disease) graze only swards with minimal or no infestation of parasitic larvae. It is assumed that adult stock that have had gradual parasitic challenge will be far less susceptible to infection and can usually safely graze in pastures having a low level of infestation without the risk of being re-infected (apart from times of stress such as at lambing, when immunity is temporarily diminished). The longer pasture is rested from grazing the more likely it is to be 'clean' and suitable for young stock. In practice 'classic clean' grazing may prove more difficult but it may be achievable, as stocking densities are considerably lower on organic farms. However, there will be times when animals may be kept in more concentrated numbers, for instance at lambing time, and this could build up infestation if there is insufficient pro-active management.
- 119. As noted, the organic livestock standards place emphasis on using management techniques such as safe grazing and lower stocking rates to control internal parasites. The use of prophylactic medicines as a routine is prohibited, although there is flexibility within the organic standards to use anthelmintics in a responsible manner where "due to an identified disease risk, the welfare of animals cannot be maintained by management practices alone ...". We fear there is potential for this standard to be interpreted inconsistently by different organic farmers. Discouraging a guaranteed prevention strategy and waiting for manifestation of the diseases before taking positive action, may compromise welfare by allowing a varying degree of gut damage before treatment is started.
- 120. Because sheep, cattle, and pigs, etc are rarely managed individually the control of conventional parasitism is logically a flock or herd problem and not an individual animal problem; consequently the practice of permitting anthelmintics on an individual basis (which the organic standards allow) may not be not a dependable solution. Organic farmers are advised to consult their veterinary surgeon and agricultural advisor as to the most suitable control measures before embarking on any grazing management and/or strategic worming routine. The use of faecal egg counts at strategic intervals during the year would seem to be essential in assessing the disease risks and evaluating the need for formal veterinary intervention.

121. Ectoparasites such as lice, mites, ticks and blowflies and the diseases they transmit are a significant cause of poor welfare in farm animals in general, and sheep in particular. As with internal parasites, it is unacceptable in welfare terms to wait until the clinical signs appear, rather than taking effective preventative action. Sheep scab may be a particular welfare problem for organic farmers. This could be exacerbated by the fact that the organic standards do not currently provide explicit guidance, thereby generating possible confusion amongst farmers over the correct preventive measures to adopt.

#### Recommendation

122. FAWC recommends that sector bodies provide guidance on parasitic control directly relevant to the welfare risk, and that they stress the need for effective action, with emphasis placed on flexibility to act in response to an identified disease risk.

#### **Use of Medicines and Vaccines**

- 123. The routine use of antibiotics, chemically or biologically synthesised veterinary products is prohibited under the organic regulations. Organic farming aims to encourage a positive development of healthy animals, and once established most organic livestock farmers appear to have little recourse to the use of conventional veterinary medicines. Organic standards do, however, permit the use of medicines where required if failure to do so could seriously threaten an animal's welfare. The use of medicines on explicit veterinary advice is therefore accepted, but it is generally regarded within organic farming as an exceptional measure.
- 124. The organic regulations require that where an animal or group of animals receives more than three courses of treatment with chemically synthesised allopathic veterinary medicinal products within one year to restore health (or more than one course of treatment if their productive life cycle is less than one year) the livestock concerned, or produce derived from them, shall not be sold as 'organic'. The loss of organic status in this way (even if only temporary), and hence of any price premium for the product, could act as a deterrent to the provision of treatment to protect an animal's welfare. For example, antibiotic dry cow therapy for all cows in the herd is a proven, effective treatment for prevention of summer mastitis in the dry period, but is not permitted under the organic standards unless a need can be demonstrated on the basis of veterinary advice. In addition to selecting animals that are genetically resistant to mastitis, and by operating disease control strategies including lower stocking rates and safe grazing, the permitted alternative method of controlling the disease is by herbal or homeopathic remedies. Such remedies have not had the rigorous evaluation of conventional medicines and farmers who use them may run the risk of compromising welfare by prolonging the disease. We are concerned by the constraints inherent in the standards in relation to the potential for using drugs to reduce pain and infection and to speed recovery.

# Recommendation

125. FAWC recommends that the policy relating to restrictions on the use of drugs in organic livestock farming is regularly reviewed by ACOS and clear guidance on their permitted use continues to be provided to ensure that treatment where needed is not

withheld. In addition, in any farming system, alternative remedies such as homeopathic and herbal products used should be subject to a full evaluation process and their acceptance should be 'evidence- based'.

126. The organic standards do permit vaccination where there is a known disease risk. However, the preference is for the use of the more limited single, two-in-one or four-in-one vaccines rather than the more complex multiple vaccines that are now available and commonly used in conventional livestock farming. In many cases this might still leave the animal at risk of disease, and vaccine choice and use should be agreed with the nominated veterinary surgeon to ensure adequate disease protection. This is especially important during the conversion period where it is expected that there would be a progressive reduction in the use of vaccines as the organic system becomes established. While we would not advocate the use of unnecessary vaccines, multiple clostridia vaccines (for example the 7-in-1 vaccine) are an effective method of protection against the full range of diseases in sheep and cattle. Such diseases are potentially present on all farms which have carried ruminant livestock in the past. In these circumstances, the organic principle of waiting for clinical signs of the disease in the absence of known risk may again result in the emergence of a serious animal welfare challenge.

#### Recommendation

127. FAWC recommends that the importance of disease prevention by immunological means is recognised and more widely accepted in organic farming, and that vaccination schemes are not abandoned, rejected or modified without specific veterinary advice. Livestock management plans should recognise welfare risks and provide explicit guidance on prevention and treatment methods.

#### **Breeding**

- 128. There is increasing evidence of the importance of animal breeding to animal welfare. This has lead to an increasing interest in suitability of genotypes for specific production systems. Some traditional qualities in many breeds have been sacrificed in the quest for better commercial performance in conventional agriculture. Modern breeds used have been selected for production features to be faster growing, to produce more milk or meat, and to be more technically efficient in food conversion. This can put animals under excessive stress, weaken their natural immune systems and increase the animals reliance on veterinary medicines. The challenge is to improve the system of husbandry to support the higher production potential of the animal. Many FAWC reports have made recommendations on addressing these challenges.
- 129. By contrast, organic systems pose a different complex of challenges to the animal as a result of standards on the nutritional environment and disease control. Organic farmers are encouraged to select breeds and strains which are adapted to local conditions and able to resist disease e.g. sheep and cattle genotypes which have good climatic tolerance for harsh weather conditions in our hills and uplands, and we very much welcome this. However, there is a basis for some concern where organic farmers continue to use animals bred for conventional production systems. This may be done because producers choose to move into organic schemes with their existing livestock for convenience, for market specification or

monetary reasons, or because there is a lack of information on how to select appropriate genotypes for organic systems from the stock currently on sale from breeding organisations or companies. We recognise that organic associations are addressing these problems. The issue of selecting stock for organic systems requires particular attention as it represents both a significant threat to animal welfare, but also a potential opportunity to resolve health and welfare problems on organic units through genetic solutions (e.g. increased disease resistance).

130. FAWC recommends the need for further research to evaluate how best to match genotype and environment in the case of all the major farm species in organic systems.

#### **Stockmanship**

131. Organic farming, by its very nature, requires farmers and stockmen to be highly skilled, knowledgeable and competent, given the complexity of the standards and the constraints placed upon the husbandry system. In addition to the advice and demonstration available from organic sector bodies, the Government currently offers one and a half days free advice to organic farmers. There is also the Organic Advisory Service and a wide availability of independent technical advice as the number of experienced, independent organic consultants increases. We believe that increased emphasis should be placed on education, training and competence for those converting to organic farming and that the organic standards should reflect the need for specific training and assessment of stockmanship competence.

#### Recommendation

132. FAWC recommends that producers should receive regular assessment and advice during the period of converting their livestock systems to organic methods, and their progress should be recorded or monitored.

#### Part VII: DEMAND SIDE ISSUES

133. The role of farm assurance is essentially to satisfy the needs of the buyer or the final consumer of livestock or livestock products. When scheme membership becomes almost universal it is of advantage to the producer only insofar as without that assurance the product may not be deemed acceptable and may therefore fetch a reduced price, or none at all. Regardless of whether the assurance schemes are devised and managed by retailers or supplier groups, in principle it is demand-side influences and requirements which provide the main driving force. Except in situations of scarcity when there is no possibility of choice, it is inevitably buyer/consumer preferences that determine what the product requirements are, how precisely they are defined and how rigorously they have to be met for the product to be acceptable. We conventionally use the term 'the consumer' in everyday parlance to mean the household or individual who eats (or at least purchases) the food product. However, although it is their preferences that the food market has to satisfy, the many millions of household consumers are far too diffuse a group to be able to exercise a coherent and identifiable influence on the farm producer. Furthermore, in the modern extended food supply chain there are hardly any opportunities and few direct mechanisms for consumers to articulate their requirements and expectations back down the line to farmers. In this context it is the food processors and retailers who have the direct contact, the substantial buying power and the operating frameworks to exercise the demand-side influence; they, therefore, effectively become 'the consumer' in the market that the individual livestock producer confronts. These major food firms have a significant influence on the manner and extent to which farm assurance develops and is implemented, and have a key responsibility in initiating awareness and delivering assurance. We believe that the development of assurance to cover the welfare provenance of all livestock products is ultimately dependent on them accepting this responsibility.

#### Role of retailers as a demand side influence

134. Although food retailers claim that their policies are determined entirely by what (household) consumers want, this is true only in a limited sense. The opportunities for individual consumers to communicate with a major food retailer and articulate a specific demand are severely limited by practicality. The reality is that major retailers are the prime determinants of the nature or range of products that are offered, and the consumers are influential only to the extent that they accept or reject from amongst what they are offered by means of their purchasing behaviour. These retailers therefore have the power to determine what choices are offered to consumers and also to specify what requirements they wish to impose on their suppliers. In terms of assurance, this makes the retailer the dominant influence as to what is required of farmers and processors and how uniformly those requirements are imposed across their product range and on their various sources of supply. Indeed, given the likelihood that most individual consumers do not know what 'assurance' means or what assurance characteristics to look for, it is essentially the retailer's decision as to whether farm assurance will be offered to them or the product sold with no specific quality label. It follows from this that if farm assurance schemes are to have any significant impact on the level of welfare of farmed animals, it is the retailers who exercise the greatest demand-side influence and who have the greatest power to create awareness.

- 135. Since the inception of farm assurance, it has been predominantly the fresh (as opposed to frozen or processed) livestock products sold by food retailers to which a farm assurance label has been applied. It appears that customers are more likely to question the welfare provenance of fresh meat rather than processed meat and we are told that consumer concerns regarding welfare assurance recede as the connection between the animal and the product diminishes
- 136. Our contacts with the major retailers indicate a variable commitment to animal welfare. All retailers claim to be committed to devising and implementing livestock standards which incorporate minimum welfare standards, but the extent to which they implement this aim and the uniformity in applying it across their product range is far from consistent. Some retailers are taking a proactive role in setting and sustaining uniformly 'higher' welfare standards for all their livestock products and taking appropriate sourcing decisions; others are more limited in the welfare assurance they offer. Over the longer term some felt that the food retail sector would exercise leadership and seek to stipulate higher animal welfare standards for livestock products (either through their own farm assurance schemes or by their sourcing criteria). Other retailers did not accept any responsibility for leading public awareness or demand on the principle of acceptable animal welfare but simply said that their actions would depend on the extent to which their customers demanded higher welfare.
- 137. There was general agreement that welfare standards should apply to all livestock enterprises irrespective of the species. A small minority of multiple retailers said that they applied their animal welfare standards to all the livestock products they sold irrespective of whether they were fresh or processed products (and they were more specialist food suppliers with a relatively small market share). At the other extreme, discount chains which competed with one another largely on price did not specify farm assurance at all whilst others did so on fresh product but not processed. We have not been convinced that the dominant retailers uniformly applied animal welfare standards across their entire livestock product range (fresh, frozen and processed). Some asserted that it was noticeably more expensive to source products having assured animal welfare standards and also noted the difficulty of ensuring consistency of supply. However, no empirical evidence was offered to support this assertion Simple consideration suggests that, aside from exceptional circumstances, the extra costs associated with requiring welfare assurance for all livestock products could not in general add any noticeable element to the final price of the products on the shelf.
- 138. Retailers who defined their own assurance standards worked in close conjunction with their supply base and with independent consultants. Some had reached agreement with national scheme providers. One retailer in particular felt that the Eurepgap Livestock Standards would provide a benchmark standard to cover production from any country. It is too early to assess if the Eurepgap initiative will be taken up widely by all food retailers, but we are aware that at present some imported product produced to Eurepgap standards can be found on supermarket shelves. However, it is not identified as such and customers will not be aware of the welfare provenance of such products. Eurepgap standards will provide a baseline for European sourcing of livestock products to a given global standard. Lack of information to the final consumer regarding the standards and the verification process will only result in widening the information gap and diminishing the extent to which informed consumer choice can be exercised.

- 139. We recognise that, given the commercial interest of retailers, the tendency is to embrace the whole range of consumer preferences from budget lines to the higher quality products. However, FAWC disputes the proposition that requiring assurance that all livestock products meet the minimum acceptable standards of animal welfare will have any significant effect on the cost of supply. It is commercially convenient for retailers to source products at the absolute minimum cost, to maintain a 'cheap' product line that offers no assurance as to its origins or provenance, and to retain maximum flexibility as to the quality of the products they source. However, we believe that this shows a lack of adherence to the basic ethical principles concerning the acceptable treatment of animals that provide our food. Retailers should be required to justify why they should not certify that the livestock products they sell come from animals that have enjoyed the minimum standards of welfare appropriate to a modern civilised society.
- 140. FAWC believes that the welfare requirements applied to food produced at home should be applied equally to imported livestock products. Retailers are in a unique position to make this a reality as they are free to make sourcing decisions based on their own criteria. They are not restricted by WTO rules which prevent discrimination between products based purely on their method of production.
- 141. Given that imported products form a significant part of the retail processed sector, we asked the main retailers if they apply their welfare standards to all the livestock products they offer, or whether they apply them only to fresh product and not the processed products. Whilst some retailers were ready to reassure us that they applied their standards uniformly and impartially, it was not possible to get convincing evidence that the standards and certification procedures applied to imported produce were identical to that for domestic supplies. Some were silent on the subject and others said that they were not willing to make such demands on their processors.
- 142. FAWC considers that this is an important area where retailers can make a major contribution to animal welfare by recognising the responsibility that comes from their prominent position in the food supply chain. We believe they should use their purchasing power by taking a leadership role in relation to the welfare provenance of the livestock products they source at home or abroad.

#### Recommendations

- 143. FAWC recommends that retailers should apply the same animal welfare standards irrespective of whether the livestock product is sold as fresh, frozen or processed, and apply those standards uniformly across their product range.
- 144. FAWC recommends that retailers use their purchasing power to make a major contribution to the uniform achievement of acceptable welfare levels by ensuring that the same welfare standards are applied to livestock products whether they are sourced at home or abroad. We also recommend that the third party audit protocol should be applied with equal rigour to both overseas and home producers.
- 145. FAWC recommends that retailers carefully review welfare standards of their international suppliers in order to ensure that products having lower specification do not undermine domestic welfare standards.

#### Role of food service sector as a demand side influence

- 146. The food service sector (or catering sector as it was known in the past) is the other route whereby individual consumers connect with the food supply chain (see diagram on page 7) and encompasses all food prepared and eaten away from the home. It includes the so called 'profits sector' (restaurants, fast food outlets, pubs and leisure sector) and the so called 'cost sector' which broadly includes catering at or below cost (staff catering, hospitals, nursing home, schools and emergency services). Overall there are 263,000 food service sector outlets, operated by about 180,000 businesses in the UK.
- 147. The food supplied by the food service sector is often highly processed and far removed from its origins as raw materials produced in agriculture. The provenance of this food can be completely obscured and, without explicit information, the consumer can identify nothing about its origins or production conditions. Should they choose to do so, suppliers in this sector could fulfil a major role in informing customers about the provenance of their products. This becomes of increasing importance as the proportion of household food expenditures which the food service sector accounts for is now approximately one-third and growing year by year, and the sector shares with retailers a key role and responsibility for supporting the objectives of welfare assurance.
- 148. Apart from some notable exceptions, we have not had much success in our efforts to engage the key food service operators. The feedback we received indicated that animal welfare is not an issue of any significance (or interest) for the sector at present. However the food service sector is always quick to respond to bad publicity regarding the food safety aspect and in one case it did take note when accused about the welfare provenance of the food it supplied. In general, however, the sector chooses to hide behind the statement that its customers do not show any explicit interest in the origins of their food, but "are more concerned with the eating experience". One major distributor supplying food to schools, hospitals and restaurants, has decided to mark its new prime meats range with the Red Tractor logo. Given the considerable reticence shown by the food sector as a whole to embrace animal welfare considerations, this is an important first step in the right direction.
- 149. Another major distributor on the other hand, simply adheres to the purchase specifications set by its clients and we were told that animal welfare does not figure in the customer nominated specifications. The main driver is said to be 'best value', considered to be a combination of price and quality (where 'quality' is more narrowly defined in terms of conventional food parameters). We were also informed that traceability on 'own brand' livestock products stops at the cutting plant. FAWC is very disappointed to find such disinterest in the issue of animal welfare, a topic that is coming to increasing prominence in the wider public consciousness.

#### Recommendation

150. FAWC recommends that, as in the retail sector, the suppliers in the food service sector should recognise their power to take a clear leadership role in relation to the welfare provenance of the products they supply and the provision of relevant information about them.

#### **Public sector procurement**

151. Public sector procurement accounts for over £1.8 billion of food supply and catering services and so can exercise a significant 'demonstration effect' by giving prominence to particular social values and purchasing criteria. The Public Sector Food Procurement Initiative in England, Scotland and Wales is intended to encourage this sector to use its purchasing power to achieve economic and environmental improvements as well as meeting social aspirations - e.g. better animal welfare. We are disappointed that, given the possibility for highlighting particular desirable aims, a requirement for at least minimum welfare standards has not been explicitly stated in this context. The Government has a major role to play in setting public values and its initiatives to change public procurement practice should emphasise the need for welfare assurance. It can hardly be expected that individuals and private sector organisations will respond to public declarations and urgings to pursue high welfare standards in food production if the Government's own purchasing activities do not endorse these principles. We find encouragement in the fact that the NHS Purchasing and Supply Agency have specified that their supplies of meat and poultry should come from Assured Food producers accredited to EN 45011. The Government has the opportunity and the responsibility to show greater leadership in this area by specifying that all livestock products supplied to this sector should meet "acceptable" welfare standards. This is entirely consistent with the Government's efforts to make farming sustainable and develop an effective partnership with livestock farmers.

#### Recommendation

152. FAWC recommends that the Government's Public Sector Food Procurement Initiative should include a series of targets to progressively increase the proportion of food supply that is obtained from sources giving explicit assurance on animal welfare, with the ultimate objective of including all livestock supplies.

#### Role of consumers

- 153. A review of food assurance undertaken by the Food Standards Agency in 2002 recommended that schemes should be driven by consumers on the demand side rather than by producers on the supply side. If assurance is to be demand led, the purpose of assurance should be to satisfy consumers, or the organisations representing consumers, that the final product has been produced in line with consumer specification and possesses the characteristics they seek. In order to achieve this, consumer organisations have a very important leadership role in defining the parameters of assurance and stipulating clear preferences for the quality characteristics that they wish to see in their livestock products. Acceptance of assurance by the consumer means trust and confidence that production of those livestock products has taken place in a manner which guarantees the desired outcome. Independent evaluation of farm assurance schemes, provided it is robust and consistent, would ensure that such consumer confidence is not misplaced.
- 154. During the preparation of this report FAWC was anxious to discover the extent to which consumers collectively or individually wish to exert influence down the food chain. Through their representatives, consumers have a clear opportunity to put pressure on the system and demand greater assurance on the animal welfare provenance of livestock

products. Farm assurance schemes have the ability to provide much more than minimal acceptable welfare assurance, but they will do so only if consumers take the initiative to articulate views and seek the changes. If consumers are not willing to wield their influence and hence abdicate their responsibility – or more realistically, are unable to do so because they lack understanding and sufficient information about the agricultural origins of their food – then the major retailers and food service operators have an even more important role to play in terms of leadership. If farm assurance is to fulfil its potential of enhancing welfare, consumer organisations, retailers and the food service sector need to join forces and work towards this common objective.

- 155. Society largely wants to be assured that animals used in food production are not ill-treated in the process, and is perhaps unable to refine its preferences beyond that. Achieving awareness of animal welfare in a society which is increasingly removed from agriculture is an important development if welfare is to be recognised as a quality characteristic. There is a need for society to understand livestock production and have a greater awareness of different production systems and the concept of animals as sentient beings. However, consumer views are diffuse and there is no coherent framework for consumer organisations to work together and bring pressure to bear on the retail and food service sectors.
- 156. In our discussions with representatives of consumer organisations it was recognised that 'consumers' were a heterogenous body of people representing a spread of attitudes and different abilities to exercise choice as a result of financial constraints. The diversity of individual preferences makes it difficult to produce a clear, focussed and collective view on animal welfare.
- 157. The question then is who identifies and exercises a declaration of preference on behalf of the general public and ensures that such a preference is based on sound information and perception? There is a parallel with consumer perceptions in relation to organic produce. Is consumer interest in organic products based on perception of high welfare? The consumer representatives felt that there was no current consumer research to provide substantive answers to those questions. There is a growing dimension of consumer awareness in environmental considerations, but we believe awareness in relation to animal welfare has not yet reached an equivalent level and is still lagging behind environmental issues in the public's consciousness.
- 158. There is little clarity as to what consumer organisations do in terms of articulating an aggregated consumer response. Neither is it clear whether they adopt an advocacy role or a response role. Organisations tend to consult their own membership when responding to issues, but of course the overall interest in society may not be adequately captured by formal membership of a consumer-orientated organisation. In relation to farm assurance standards, consumers desire better dissemination of information and benchmarks that are easily comprehensible to the average shopper.

#### Recommendation

159. FAWC recommends that consumer organisations should take a more pro-active role in discerning and articulating an aggregated consumer response on the level of animal welfare assurance they expect in their livestock products.

#### Labelling

- 160. Over the last few years FAWC has emphasised and reinforced its view that the conditions under which farm animals are reared, marketed and slaughtered become an integral quality characteristic of the resulting livestock product. Therefore our animal welfare concerns relate not just to how livestock-based food is produced in the UK, but more broadly to the welfare background of all such food that is consumed. This leads us to the conclusion that some message about the nature of the welfare standards spanning the life of the animal (conditions on farm, in transit, at market and at slaughter) is essential information for the purchaser. This information should be available for all livestock products, whether domestically produced or imported, whether fresh or processed.
- 161. Consumer research indicates that there is a lack of comprehension, a sense of frustration and confusion caused by a plethora of labelling devices and some bewilderment at the essence of the message being conveved. To meet consumer needs, the welfare provenance of all livestock products should be made available to the extent desired, in a clear and informative manner, and in a form that will dependably confer the assurance that the purchaser seeks. A simple and immediately recognisable visual indication (tick mark, logo etc) that the product is "welfare assured" should be easy to devise and is largely sufficient for most people; it is neither necessary nor helpful to attempt to explain the full meaning of this on the product (by analogy it is sufficient for people to know that a product has been confirmed as 'electrically safe' without knowing the details of the tests and parameters that underline this declaration). Beyond this, the amount of information relating to welfare that should be provided to all prospective customers is a matter for careful judgement, with further information being available on request for the interested consumer. However, the reduction of assurance information to a simple mark on a product label does emphasise the need for the background framework of standards and verification upon which that assurance is based to be rigorous, consistently applied and independently certified. FAWC is currently looking into the implications of welfare labelling of livestock products and will be reporting at a later date.

#### Conveying the message

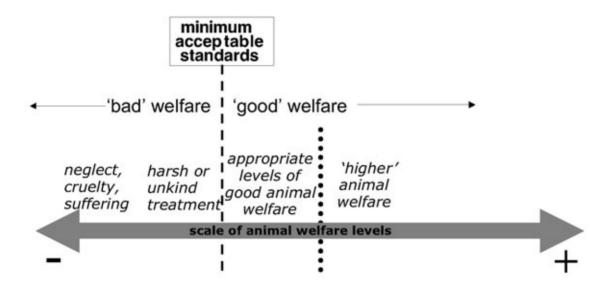
162. We have not seen any evidence to suggest that consumers actually want to be in a position to drive assurance from a welfare perspective. In an affluent, food secure society, price is not the main criterion driving purchasing decisions for the majority of the population. It is value, rather than cheapness which consumers seek. The focus has now moved to the quality characteristics of food rather than its availability; and the quality characteristics – real or perceived – become the major selling point of the food product. However, there is no single specification of the preferred characteristics, and different consumers may place different values on the characteristics which they wish to have in their livestock products. Many of the important quality characteristics (such as welfare provenance) are 'intangibles' which cannot be observed and evaluated either before or after purchase, but have to be accepted on the basis of trust in the wider framework, and this highlights the crucial role of farm assurance in meeting consumers' needs.

163. In order to make a purchasing decision based on welfare provenance, consumers need to make the connection between a piece of meat or animal product and a living animal. This ideally requires some knowledge of animal husbandry and production systems, and this lack of connection has been seen as an important omission needing correction. Whilst it would be ideal for consumers to be in touch with the land and agricultural practices, essentially all that is needed from consumers from the welfare perspective is the desire to purchase food from welfare friendly systems; the determination to ensure that this desire is catered for by the supply side; and the willingness to pay a supplement if necessary to ensure that the welfare need has been taken care of.

# Part VIII: OUTSTANDING QUESTIONS AND ISSUES

#### What is acceptable welfare?

164. There is no unique answer to this question. Welfare scientists who have examined this area in detail will have specific views but in relation to the individual final consumer it is an ethical question based on personal values and from the policy standpoint it is essentially a matter of social judgement. Public awareness of the welfare of farm animals carries forward into the demand for livestock products and a growing preference for 'welfare friendly' products. Such products enable consumers to enjoy their food with some degree of confidence regarding the treatment of the animal from which it originated. Whilst there is no widely accepted scale for measuring or even ranking animal welfare states (especially across different animal species and production systems), the images associated with 'acceptable welfare' in a society tends to evolve over a period of time with greater access to information and increasing affluence. The concept of 'minimum welfare standards' helps to bridge that gap by defining a threshold below which treatment of animals would be deemed harsh or unkind, degenerating to neglect, cruelty and 'suffering' (see diagram below). On the other side of that line the treatment of farm animals could be described as 'acceptable' or 'appropriate' with standards of welfare leading incrementally to 'higher welfare'. Note that the range of animal welfare levels represented in this framework is not comprised of measurable points (as in a temperature scale). Rather it is simply indicative of broadly distinguishable zones in which judgements would be made as to whether welfare was considered to be 'bad', 'good', 'very good' etc.



165. The encouragement of incremental improvement, the attainment of 'higher welfare' and the enhancement of consumer choice are important aspirations over time in our society. However, FAWC believes that the main objective should be to ensure that the minimum acceptable levels of welfare are enjoyed by all farm animals and are met by all producers. Council does not accept that it is satisfactory for some animals to enjoy enhanced or 'high'

welfare conditions while others are subject to conditions which are regarded as unacceptable. In this sense instances of 'good' welfare do not compensate for instances where welfare is 'bad' in the context of the above diagram.

#### How can 'appropriate' welfare standards be achieved?

166. Compliance with minimum welfare standards as defined in legislation is enforced by the State Veterinary Service and Local Authorities in relation to commercial livestock producers. Given that there is no legal requirement for livestock keepers to demonstrate a basic level of competence, and the large number of people who keep farm animals for reasons other than income earning or profit, there are many opportunities for poor welfare to go unidentified. Even in commercial production it is not always possible to link poor welfare with low productivity or with an identifiable lower quality in the final product. It is important in this context to distinguish between systematic failures due to poor husbandry and unavoidable events (accidents on farm) which may result in a welfare challenge which is temporary, unpredictable and not linked to inherent welfare problems. Even with a system for the formal licensing of all livestock keepers, the public sector framework could not provide assurance that every single livestock farm adheres to the legal minimum welfare standards.

167. While farm assurance cannot guarantee this either, it does offer an alternative, more effective market-based approach with wider coverage, provided the standards are explicit, well defined and strictly enforced via a third party inspection system. Whilst industry-led national assurance schemes are currently more prevalent, individual retailers still have a stake in seeking higher standards in the pursuit of product differentiation, or enhancing the robustness and integrity of the final product in order to minimise the chance of non-compliance. The inevitable media backlash that accompanies exposure of welfare failures in farm assurance schemes has been evident in recent years. Retailers are fully aware that the greater the traceability of the system, the greater the chance of damage-limitation by responding speedily and effectively in the event of such a failure.

168. It is important that scheme owners continually appraise their standards and their processes for enforcing them. Only in this way will welfare requirements move over time in line with society's concerns and with scientific understanding. Scheme owners should ensure that standards are reviewed in the light of scientific advances. Regular reviews by Technical Advisory Committees (TACs) should be focused on identifying any perceived weaknesses in scheme standards and redressing them.

#### Recommendation

169. FAWC recommends that Technical Advisory Committees pay particular attention to the incorporation of assessment of welfare outcomes in scheme standards and ensure that appropriate links with the scientific institutions are fostered so that they are kept up to date with new husbandry practices and technology following research in this area.

#### To what extent can farm assurance really deliver welfare?

170. It is very difficult at this stage to answer this question on the basis of empirical

evidence, as there appear to be no research studies which had addressed this issue in a structured manner. Furthermore, scheme owners do not publish their data on the extent and nature of welfare non-compliance their inspections reveal, nor how these may change when farms become established in their schemes. However, following one of the recommendations in the FAWC 2001 report, the information collected during SVS welfare inspections was expanded to enable the comparison of compliance with welfare legislation and codes of practice on assured farms with that on non-assured farms, with welfare compliance in the two groups being compared statistically. The results of the study do suggest that membership of farm assurance schemes had a significant positive effect on recorded standards of welfare, high levels of compliance with both welfare legislation and welfare codes being recorded on assured enterprises.

- 171. Even if standards on assured farms do not appear to be universally higher this does not mean that schemes have had little effect. There could be several explanations such as: the welfare requirements in assurance schemes are not particularly demanding; the existing welfare standards in schemes need to be more rigorously enforced; or that the animal welfare standards throughout the generality of British livestock production are largely already at acceptable levels and there is no major corrective task for schemes to undertake. Nevertheless, the benefit of the schemes is that they provide assurance that welfare standards are being met, thereby removing the uncertainty that would have existed in their absence. This, in itself, is an element of added value. In the last analysis, 'assurance' is simply confirmation that some features or requirements are satisfied, and does not necessarily imply a change in anything.
- 172. In conclusion, we return to the question of the extent to which farm assurance schemes are capable of delivering credible assurance on the welfare of animals at every stage of the food chain. We consider that farm assurance schemes over the years have built up a producer base, which can be used to influence better welfare. However, we do not believe that assurance schemes have yet delivered all the benefits they could in terms of acceptable animal welfare, to a large extent because the food retailing and food service sectors have not sufficiently embraced their aims or applied their procedures wholeheartedly across their product range. Furthermore, we do not believe that farm assurance is capable of delivering welfare standards across the board much beyond the minimum acceptable levels but, given these levels are 'acceptable', by definition, this should not be considered a failing. For some time yet it will be only a minority of consumers who are prepared to seek out and pay for 'high' welfare food products, and only a minor interest for food purveyors to seek brand differentiation on animal welfare criteria.
- 173. We believe that assurance schemes will be able to deliver welfare benefits, only if the following requirements are met:
- (1) Acceptance of the proposition that it is necessary in ethical terms for the welfare of all farm animals to be satisfactory, and that the treatment of animals cannot be separated from the food products they supply;
- (2) Whole hearted commitment to safeguard welfare of farm animals being demonstrated not only by producers but by all sectors of the food chain, with leadership being shown by the retailers, foodservice sector, and individual consumers;

- (3) Animal welfare is given greater prominence in assurance scheme standards and efforts are taken to raise general awareness of welfare issues;
- (4) Household consumers have the information and the desire to exercise a preference for welfare friendly livestock products. Whilst they may not be a large sector of the population at present, it is a growing one. As a result of CAP reform there is a growing public awareness of environmental characteristics and the same can, and should be expected for animal welfare;
- (5) Given the inevitable indifference to animal welfare by some sections of the consuming public, the producers and purveyors of food accept an explicit responsibility on behalf of society to provide at least 'minimum' animal welfare standards, regardless of any expressed demand or lack of it;
- (6) Constructive use of the on-farm data accumulated by schemes and the evaluation of such data by scheme owners to improve delivery of the welfare component of assurance schemes; willingness to be responsive on the standards as well as the inspections/audit procedures;
- (7) Government commitment and leadership not only to support farm assurance schemes but to foster animal welfare improvements, in line with the Sustainable Development Strategy and Animal Welfare Strategies in England, Scotland and Wales, through the farm assurance network and through their public procurement policies;
- (8) Serious and realistic enforcement of welfare standards, followed by appropriate response and sanctions by scheme operators;
- (9) Development of better methods of assessing animal welfare that are consistent with the nature and time constraints of a wide-ranging on-farm inspection; and
- (10) Continuous assessment and review by scheme owners to produce examples of best practice and provide 'bench marking' information to scheme participants.

#### **SUMMARY OF RECOMMENDATIONS**

#### Part III: Accreditation and certification

- 32. FAWC recommends scheme owners should ensure that their Technical Advisory Committees have the necessary knowledge, skills, balance of interests, scientific guidance and independent advice on animal welfare to ensure that their standards embody appropriate, enforceable requirements in relation to the welfare of farm livestock.
- 33. FAWC also recommends that scheme owners ensure a mechanism is in place for initiating and implementing changes in standards, and that this process is clear and transparent.
- 44. FAWC recommends that all scheme owners should be working towards meeting the principle that all animals sold as 'farm assured' should have met the assurance requirements throughout their life, from birth to slaughter.
- 47. FAWC recommends that both national and international scheme owners should be in a position to provide clear information on the coverage of their standards so that it is evident whether or not there is any equivalence between the different standards.
- 51. FAWC recommends that equivalence arrangements and systems of mutual recognition in terms of welfare are clear and transparent, with equivalence of standards as well as equivalence of inspection and enforcement, and that these arrangements are regularly reviewed. It is particularly important that assurance schemes operated in other EU Member States and in countries outside the EU can demonstrate their equivalence to UK schemes.
- 54. FAWC recommends that the Government should seek during WTO talks to ensure that minimum welfare standards are allowed as a condition attached to trade in livestock products on the basis that quality standards exist to benefit consumers, not to protect producers.
- 56. FAWC recommends that the Government should use the opportunities presented in the proposed Rural Development Regulation to sustain and promote good animal welfare thereby reinforcing its commitment to the concept of partnership established in the Animal Health and Welfare Strategy.

#### Part IV: Assessment / audit of animal welfare

- 62. FAWC recommends that scheme owners should work towards refining their standards and inspection procedures to achieve an increasing inclusion of welfare outcomes, so as to provide both a better reflection of the welfare of the animals within a production system and the level of stockmanship on the farm.
- 63. Certification bodies should ensure that assessors possess the knowledge, skills and competencies in livestock husbandry as well as audit procedures and possess the ability to observe, question and judge the level of animal welfare.

- 67. FAWC recommends that research into welfare assessment should focus on:
- (a) Methodologies for measuring key inputs and outputs that affect and reflect animal welfare including behavioural measures relevant to assessment of animals' mental health and measures that provide integrative assessments of welfare;
- (b) Validation of all measures used as welfare assessment tools;
- (c) Analysis of the relationships between welfare inputs and outputs with a view to integrating these measures into a welfare index where research indicates this to be appropriate.
- (d) Collaborative research including producers, to promote the skills and methods necessary to enable farmers to make continuous assessments of the health and welfare of their stock.
- 74. FAWC recommends the provision of more detailed inspector guidance relating to the assessment of animal welfare, with clear indicators of 'acceptable' and 'unacceptable' welfare. The presence of any UPUD should be classified as a major non-compliance with consequent immediate action required or sanctions imposed.
- 75. FAWC recommends that all scheme standards should have a consistent, documented and transparent approach to the treatment of non-compliances in relation to animal welfare.

## Part V: Supply side issues in farm assurance

- 83. FAWC recommends that Technical Advisory Committees place more emphasis on developing better methods of assessing the abilities of stockmen to assess animal welfare, based on the way that they interact with animals and the demonstration of vision and ability to foresee problems and take appropriate action (the latter should be linked with the preparation of detailed health and welfare plans).
- 92. FAWC recommends that scheme owners should emphasise the need for livestock producers to construct a health and welfare plan, and to ensure the maintenance of records needed for the development of such plans.
- 93. Scheme owners should ensure that schemes specify a requirement for the annual updating of health and welfare plans and for the monitoring of the actions specified in the plans.
- 97. FAWC recommends that all farm assurance scheme standards should ensure that there is no distinction between treatment of low value and high value animals and that the appropriate treatment of cull and casualty animals is explicitly specified in the health and welfare plan.

# Part VI: Animal welfare implications of organic certification schemes

115. Herd/flock health planning on organic farms should include a disease risk assessment for all classes of animals depending on the past history of the farm as well as disease incidence on neighbouring farms. These plans should be equivalent to the herd/flock health and welfare plans widely advocated in conventional livestock farming and should include an

agreed programme to achieve full compliance with the target animal health and welfare standards. FAWC recommends that there should be an equal emphasis on welfare in the structure of these plans.

- 116. FAWC recommends that for new entrants to organic livestock farming undergoing the conversion process from conventional livestock production, the health and welfare plan should stand as a centrepiece in the conversion plan, and new producers should receive explicit attention and guidance from their certifying bodies in adapting to the new health management regimes that are required.
- 122. FAWC recommends that sector bodies provide guidance on parasitic control directly relevant to the welfare risk, and that they stress the need for effective action, with emphasis placed on flexibility to act in response to an identified disease risk.
- 125. FAWC recommends that the policy relating to the restrictions on the use of drugs in organic livestock farming is regularly reviewed by ACOS and clear guidance on their permitted use continues to be provided to ensure that treatment where needed is not withheld. In addition, in any farming system, alternative remedies such as homeopathic and herbal products used should be subject to a full evaluation process and their acceptance should be 'evidence-based'.
- 127. FAWC recommends that the importance of disease prevention by immunological means is recognised and more widely accepted in organic farming, and that vaccination schemes are not abandoned, rejected or modified without specific veterinary advice. Livestock management plans should recognise welfare risks and provide explicit guidance on prevention and treatment methods.
- 130. FAWC recommends the need for further research to evaluate how best to match genotype and environment in the case of all the major farm species in organic systems.
- 132. FAWC recommends that producers should receive regular assessment and advice during the period of converting their livestock systems to organic methods, and their progress should be recorded or monitored.

#### Part VII: Demand side issues

- 143. FAWC recommends that retailers should apply the same animal welfare standards irrespective of whether the livestock product is sold as fresh, frozen or processed, and apply those standards uniformly across their product range.
- 144. FAWC recommends that retailers use their purchasing power to make a major contribution to the uniform achievement of acceptable welfare levels by ensuring that the same welfare standards are applied to livestock products whether they are sourced at home or abroad. We also recommend that the third party audit protocol should be applied with equal rigour to both overseas and home producers.

- 145. FAWC recommends that retailers carefully review welfare standards of their international suppliers in order to ensure that products having lower specification do not undermine domestic welfare standards.
- 150. FAWC recommends that, as in the retail sector, the suppliers in the food service sector should recognise their power to take a clear leadership role in relation to the welfare provenance of the products they supply and the provision of relevant information about them.
- 152. FAWC recommends that the Government's Public Sector Food Procurement Initiative should include a series of targets to progressively increase the proportion of food supply that is obtained from sources giving explicit assurance on animal welfare, with the ultimate objective of including all livestock supplies.
- 159. FAWC recommends that consumer organisations should take a more pro-active role in discerning and articulating an aggregated consumer response on the level of animal welfare assurance they expect in their livestock products.

# Part VIII: Outstanding questions and issues

169. We recommend that Technical Advisory Committees pay particular attention to the incorporation of assessment of welfare outcomes in scheme standards and ensure that appropriate links with the scientific institutions are fostered so that they are kept up to date with new husbandry practices and technology following research in this area.

#### **APPENDIX A**

#### SCIENCE BASED ANIMAL WELFARE ASSESSMENT

- 1. Scientific assessment of welfare is seen as an important means of reducing bias in the debate over animal welfare. This Appendix is particularly concerned with the development of scientifically based methods for welfare assessment to support farm assurance.
- 2. A major benefit of applying science to animal welfare is that science can provide objective approaches to assessing welfare especially where there are different interpretations over the extent of animal suffering. Based on the general premise that a scientific approach to animal welfare can resolve disputes and create common approaches to dealing with welfare issues, many governments in Europe and elsewhere have directed public funding towards animal welfare science and developing approaches for animal welfare assessment.
- 3. The result of this research has been the development of a number of different scientific approaches to welfare assessment. The diversity of views on how to scientifically assess welfare can be seen as reflecting the complexity of the issue, and perhaps also the relative 'immaturity' of animal welfare science. This diversity of views can be seen as a positive in the sense that the complexity of animal welfare demands a multiplicity of approaches to properly assess it. However, the current flux of views on the scientific assessment of welfare does raise potential limitations when it comes to translating the science of animal welfare into practice.
- 4. Critically science has not yet been able to offer up a 'gold standard' measure of welfare against which to validate new measures or approaches. Given the complexity of the issues involved in animal welfare it maybe that scientifically such a gold standard measure of welfare is more of an aspiration than a realistic outcome of research. Nonetheless the lack of a gold standard is a major constraint to the validation of on-farm welfare measures.
- 5. There has been a growing demand for more practically based on-farm welfare assessment tools. A significant driver here has been the creation of farm assurance schemes, which in part aim to assure the public that their purchased animal products originate from animals reared and killed under acceptable welfare conditions. The success of these schemes in terms of maintaining or improving animal welfare standards must be heavily reliant on the quality of the measures they use to assess welfare. In addition to farm assurance assessors, there are other potential users of on-farm welfare assessment tools, including the State Veterinary Service (SVS), and farmers themselves.
- 6. The need for on-farm welfare assessment tools has inevitably led to a growing amount of associated research in many countries. At the time of writing, research work in this area is summarised in papers presented at workshops on farm and group welfare assessment, one held in Copenhagen in 1999, the other in Bristol in 2002.
- 7. The available literature indicates that research on practically based welfare assessment is still at an early stage of development with much of the research still in the process of collecting data. The paucity of published results does limit any assessment of the success of research at this stage.

8. Current research experience does however importantly show how the balance of different factors can influence the development of on-farm welfare assessment methods:

#### **Underlying principles**

- 9. The Animal Needs Index (ANI or Tier-Gerechtheits-Index (TGI)), developed in Austria was designed to certify minimum standards of housing to meet defined animal needs in a way that was simple and easily applied across the range of conditions existing on different farms. This resulted in an approach that focused on assessing how the physical nature of the farming system met the animals' requirements.
- 10. 'Operational' definitions of animal welfare have been used to circumvent the inherent problems of defining welfare. The ANI is aimed at assessing 5 aspects of the animal's environment believed by the researchers to be critical in affecting welfare (eg extent of mobility; quality of human care). In another example a French-based study of on–farm assessment of dairy cow welfare, defines welfare in terms of the '5 Freedoms'.
- 11. Concepts and approaches originally conceived for other purposes have been developed for on-farm welfare assessment. An example, is the use of the Hazard Analysis and Critical Control Point (HACCP) system by The MacDonald's Corporation to audit welfare during slaughter of pigs and cattle.
- 12. There is a growing influence from principles of animal welfare science, for example through the use of techniques for observing animal behaviour to assess on-farm welfare.

#### Choice of welfare indicators

- 13. In current welfare assessment research the choice of welfare indicators has been influenced by the overall aim of the research and the underlying principles:
- In the initial phases of developing approaches to certify housing standards (eg the ANI) the choice of indicators was based on the requirement of being simple to apply, easy to interpret and applicable to a range of farm conditions. These constraints led to an approach largely based on assessing the environment and management (eg length of stall; feeding and drinking facilities) rather than the animal itself. Subsequent developments of the ANI (eg the ANI 200) have introduced animal based measures including behaviour.
- The trend towards more inclusion of animal-based as opposed to environmental measures is now widespread through different approaches, with the majority using a mixture of environment and animal-based measures. Animal-based measures include health, behaviour and physiology.
- Choice of measures can be made using available literature or expert opinion. For example, welfare measures have been built from the 'bottom-up' with an initial phase where potential indicators were indicated from the scientific literature (and from other sources). This information value of each measure and suitability for on-farm

studies), used to reduce the initial set of indicators. Another approach has been to canvas expert opinion, for example the gathering of the professional opinion on important welfare issues and how to best assess them through a Delphi process which is a systematic approach to gathering opinion and reaching a consensus across a wide group of experts.

#### Validity and reliability of welfare indicators

- 14. The validity and reliability of welfare indicators are critical elements in effective welfare assessment:
- Strictly, a valid indicator is one which measures the attribute for which it was developed. The question of validity is relative to the goal of the method; an approach maybe valid for certification of housing whilst not being validated as a method for directly assessing welfare. For this report we are most concerned that indicators used in assurance schemes do deliver valid assessments of on-farm animal welfare.
- In an ideal world a welfare indicator would have proven scientific validity and be applicable under practical conditions. However, there are major constraints to achieving this ideal. As indicated earlier there is no gold standard(s) against which to validate other measures of welfare. Furthermore, the requirements for scientific validity and practical implementation can be antagonistic, a fact that underlies the difficulty of developing existing scientific approaches for the purpose of on-farm welfare assessment. It is clear that much work is still required to reconcile scientific validation with the practical constraints of on-farm welfare assessment.
- There are different degrees of validation. These range from less stringent levels such as 'face validity' (a subject opinion that a measure is valid) to more severe tests such as 'construct validity' (where hypotheses regarding the relationship between the measure and welfare tested are confirmed).
- Measures of reliability estimate the errors inherent in using a measure, for example the consistency with which one observer or different observers use the measure (intra and inter-observer reliability respectively).
- The central importance of validity and reliability of measures can be illustrated in the debate over the 'gait score' (a 6 point rating scale), used in a large-scale industry survey to assess incidence of leg problems in broilers. There is continuing controversy over the results of this survey as a result of the perception that the gait score is imprecise, due to its' 'subjective' nature and reported low intra-observer reliabilities. Such debate underlies the emphasis placed on the validity and reliability of welfare assessment tools by the OIE in establishing internationally agreed 'evidenced-based' animal welfare standards.
- The literature at this time suggests that many measures currently being used to assess animal-based welfare assessment have not been developed through an exhaustive process of testing validity/reliability, and in that sense could be seen as insufficiently robust especially in the context of setting international standards. The central

importance of validation/reliability is as relevant for those outcome that have an indisputable link to welfare (eg lameness), as for outcomes where the link to welfare is less certain (eg stereotypic behaviours). It is also important that all approaches used to develop on-farm welfare assessment tools address the issues of validity/reliability. For example the gathering of expert opinion such as in a Delphi exercise, provides face validity but without further work or supporting evidence does not provide other forms of validity. In relation to construct validity there are relatively few measures/methods which have been taken through to the point of hypothesis testing.

- There is also a need to address the problems posed through not having a gold standard against which measures of animal welfare can be validated. One solution could be to use 'hard outcomes' such as disease or other functional 'problems' (eg reproduction) to validate other on-farm welfare measures including behaviour. One important advantage of this approach is that health and reproduction have economic implications to the industry, and there should be added value in collecting data on additional measures (both environmental and animal based) that affect them.
- However, to only consider validation against outcomes such as disease could have the disadvantage of not placing sufficient emphasis on measures indicative of the animals' mental well-being in its own right. There has been much experimental work on behavioural measures of welfare; examples include the use of behaviour to investigate the 'need' of animals for access to important resources and the effects of poor housing on emotional states. Despite this body of experimental work there have been relatively few successful attempts to develop valid and reliable behavioural approaches for use under field conditions. One obvious problem with behavioural measures is that they often require a considerable amount of time.

#### **Practical constraints**

15. On-farm welfare assessment requires to be done quickly and efficiently. These time and efficiency constraints place as much constraint on the development of welfare assessment tools as the scientific requirement for on-farm welfare assessments to be valid and reliable. As indicated earlier it was the time and efficiency constraints that led to early on-farm welfare assessment approaches being focused on assessing the quality of the resources available to the animal. The various initiatives to incorporate more animal-based measures into assessment schemes are all predicated upon the need for these measures to be rapid and efficient to use.

#### **Integration of measures**

- 16. From a farm assurance perspective, providing production units with a single integrated 'welfare score' has obvious attractions in terms of efficiently demonstrating units which are at or above the required welfare standard. A welfare score can also link through to labelling schemes to assure consumers on the welfare standards of the food they purchase.
- 17. From a scientific and practical perspective there is also often a need for integration of measures as current welfare assessment procedures collect data on a large number of measures. Scientists will also often want to understand the relationships between different measures.

- 18. However before fully embracing the concept of integration as unambiguously desirable, it is relevant that research has illustrated that farms generally are neither wholly good or bad, indicating that farms need tailored information on the welfare of their livestock. Collapsing all of the welfare information on a farm into a single score may not be an effective strategy for improving welfare on individual units that require customised information on how to improve welfare.
- 19. Broadly two main philosophies are developing in relation to the integration of on-farm welfare measures:

## 'Bottom-up' philosophy

Within this category are on-farm assessment approaches which collect information on large numbers of variables, and where it is therefore necessary to reduce this large body of data into composite welfare assessments or scores.

'Index scoring systems' are an example of integration of welfare measures in a 'bottom-up' direction. The ANI system and its variants (including the Freedom Foods assessment scheme) typically scale conditions on farms by scoring between 30 and 70 variables that primarily assess housing and management conditions. Scores for variables are summed within categories and also to provide an overall welfare score. Various rules apply to the summing of scores, for example not all variables are measured over the same range allowing some variables a greater influence on the overall score. One issue that discriminates between the variants of index systems is whether compensation is allowed (ie whether good scores for certain measures can compensate for poor scores in others). Rules on summing scores and compensation reflect expert opinion and field experience.

Other research is developing the principles of measuring quality of life (QoL) in human medicine for use in animal welfare assessment. The approach is aimed at developing indices for assessing major welfare concerns such as animal pain. The development of these indices is based on collecting lists of words or expressions from experts (e.g. veterinary surgeons) that relate to a concern such as pain in dogs. The process of refinement of terms is both based on expert opinion and interventions from the research team. Mathematical scaling models are then applied to estimate weights for individual terms in the index; expert opinion again plays a central role in this process as there is no independent way of estimating the relevance of terms in relation to welfare. Indices can be developed for different areas of concern (e.g. health, disease, behaviour), and indices can be considered separately or summed.

#### 'Top-down' philosophy

Other approaches aim to use measures which are integrative in their own right thus reducing the requirement for integration 'after the event'. An integrative measure is one that subsumes and hence predicts a number of other related measures; the mechanism leading to integration may not be transparent. The use of integrative measures aligns with the view that the process of welfare assessment needs to 'weight' key issues, for example that welfare assessment should focus on animals physical and mental health. The philosophy of focusing on key issues moves away from the precept of measuring many variables, to collecting data

on a limited set of validated measures. It also follows that a more limited set of variables should in their own right integrate information on the animals' state of welfare. Examples of integrative measures include:

#### Disease

Disease comes about both through factors influencing risk of exposure to pathogens and those factors which affect the susceptibility of the individual including 'stress'. Valid records of disease therefore provide an integrative measure of the various factors affecting physical health.

#### Behaviour

One of the advantages of behaviour as a tool for welfare assessment is that it is the integrative outcome of many underlying neural, physiological and psychological processes. In principle behaviour can thus be used as an integrative assessment tool to diagnose disease, pain and also to interpret the animals' emotional state.

#### **Conclusions**

- 20. For the purpose of this report it is assumed that the goal of on-farm welfare assessment should be to accurately assess animal welfare (within constraints) as opposed to other potential goals (eg certification of production/management systems that are perceived as producing higher welfare). We see the ultimate goal of research in this area as being a set of standardised and validated measures that can be used by producers to improve the welfare of their stock and by assessors to externally audit on-farm welfare.
- 21. There is currently a substantial amount of research devoted to developing scientific approaches for on-farm welfare assessment. Much of this research is now co-ordinated under an EU FP6 research programme entitled Welfare Quality. Clearly this research network presents a valuable resource for farm assurance schemes to use for the continuing development of their welfare assessment procedures/measures. We would encourage those involved in development of Farm Assurance standards and on-farm assessment schemes, to acquaint themselves with the Welfare Quality project (www.welfarequality.met/everyone) to ensure rapid dissemination of approaches/methods for on-farm welfare assessment.
- 22. The development of on-farm welfare measures involves a difficult balancing of practical constraints (mainly relating to time and efficiency) against the need for on-farm measures of welfare to be valid and reliable.
- 23. Research based welfare assurance approaches most commonly use a substantial list of measures typically with 30-70 items, in recognition of the many factors which affect welfare. In early approaches these measures related only to the resources and management of the farm but increasingly there is a trend to introducing animal-based measures.

- 24. The main scientific issues in relation to these current approaches relate to the validity/reliability of the measures and the integration of the individual welfare measures into some form of usable composite welfare index or score.
- 25. We would also encourage researchers and those involved in collection of on-farm data (e.g. assurance and health schemes, SVS) to work in partnership to collect concurrent data on validated physical health and other welfare measures including behaviour. This data could be used to: explore relationships between physical and mental health inputs and outcomes; to integrate measures where appropriate into composite welfare scores; estimate the balance of costs: benefits for health and welfare improvements.

#### APPENDIX B

# ATTITUDES OF LIVESTOCK PRODUCERS TOWARDS FARM ASSURANCE SCHEMES

1. As part of its enquiry into the role and potential of farm assurance schemes FAWC undertook a survey of the views held by livestock producers. A random sample of farmers in England and Wales covering all livestock types was drawn by Defra officials from the Agricultural Census listings, and a simple questionnaire sent to each. Almost 600 usable replies were received, and the main findings which emerged are presented below.

#### Pattern of responses

2. Of the 592 replies received well over half of the farmers operated a beef enterprise, some 40% kept sheep and almost one third were dairy farmers; a further 20% produced pigs and a similar proportion were poultry producers. Thus the range of livestock types as well covered in the survey (note: the percentages sum to more 100% because many respondents operated more than one type of livestock enterprise). In each case, too, the survey covered the full range of enterprise sizes found in commercial practice, from small herds/flocks to the very large.

#### Participation in Farm Assurance

- 3. Interestingly, some 80% of the survey respondents were members of a farm assurance scheme. This is a higher proportion than in the overall population of livestock producers and there was obviously a greater tendency for farm assured producers to elect to complete the questionnaire. However, this bias is in many senses beneficial to our purpose, which was directed towards seeking the views and experiences of scheme members. The remaining 20% of producers were asked why they had not joined a scheme, and the dominant response (given by over a half of them) was that they saw no advantage. A further 40% claimed that it would be too costly, while a third believed their output was too small to warrant membership. These are interesting perceptions (and perhaps misperceptions?) in the light of responses from scheme members (see below), many of whom were small producers, many more who found that it had incurred little cost but also a substantial proportion who considered they had not benefited a great deal.
- 4. The range of reasons given for having joined a scheme was quite informative, with almost 60% of members declaring they had 'no option'. This reflects the fact particularly in the case of dairy and pig farmers that membership of a nominated/approved farm assurance scheme was an essential requirement in their supply contracts with processors or retailers. One third of producers recognised that scheme membership might give them better access to markets but only a quarter had joined in expectation of gaining higher product prices. Interestingly, a third of all respondents stated they had joined schemes because they personally believed in the product quality standards that were implied.

5. In terms of finance a highly variable picture emerged. Nearly half of all respondents reported there were no extra capital costs involved as a result of participating in a farm assurance scheme, and nearly 40% reported incurring no extra operating expenditure. To this larger group, therefore gaining the 'farm assurance' label was largely a costless exercise. Of those that did report additional expenditures had been necessary (and excluding a few observations that were clearly distinctive special cases) the average capital cost (for bringing facilities up to standard, etc) had amounted to some £7-8000, while average additional costs of participation were in the order of £1500 annually. Although not substantial, producers would clearly validly expect some financial/marketing advantage from farm assurance unless, as many had reported, they had no option but to incur these costs. The more revealing finding was that nine of ten respondents declared that the way they kept their livestock was no different as a result of joining a farm assurance scheme.

# Benefits and importance of farm assurance

6. Turning to producers' views, more than two thirds of respondents overall considered that farm assurance schemes had either not much or no impact at all on animal welfare (perhaps not surprising in the light of the earlier finding that animals were kept no differently). There was some difference in view between the two groups in the sample, with a third of those who were scheme members believing assurance improved animal welfare 'somewhat' or 'a lot' while less than one fifth of non-members held this view. If there is not much in it for the animals it is not thought that people gain much either. Three quarters of all scheme members claimed they had gained little or no benefit. Furthermore, producers did not consider that consumers gained either, with two thirds of them declaring they believed consumers valued farm assured livestock products not much or not at all. These views seem to raise the question as to who it is all for then. And the answer (at least in producers' minds) is quite clearly the retailers, with 70% of respondents declaring a belief that food retailers influence welfare standards in farm assurance to a greater or lesser extent.

#### Farm assurance policy

7. Not surprisingly there was a marked difference in attitude between those who were members of farm assurance schemes and those who were not when questioned about how things ought to be. Of scheme members, in the region of 60% considered that all livestock should be farm assured and that non-assured animals/products should attract lower prices both at the farm gate and in the supermarket. By contrast, some 80% of non-members gave totally the opposite response to those questions. There was less difference between the two groups when questioned about what aspects of farm assurance schemes relating to livestock are important. The need for formal animal health plans has become a distinctive feature in virtually all writings on and specifications of assurance schemes, yet there was an approximately 50/50 split overall between those who considered they were very or somewhat important and those who claimed they were effectively unimportant. The same split was revealed in relation to the perceived importance of both 'annual rigorous inspections of premises and livestock' and 'random inspections'. What does come across as a strongly held view, regardless of scheme membership, is that farmers and inspectors should have a full understanding of animal welfare codes.

#### Overview

- 8. Taken together, what can we conclude from this brief survey? First that livestock producers appear to feel that farm assurance is to a large extent something imposed on them by 'external' influences and not something they espouse wholeheartedly as an integral part of their production philosophy or see as a beneficial element in their marketing strategy. This is perhaps indicative that modern attitudes about the role of farming being essentially to serve demands in the food chain are still far from universally accepted, and that older presumptions that agriculture is all about 'producing' are still dominant. Second, their experience of farm assurance is that it is pretty much a 'paper exercise' with little impact on the way they farm and little real cost and even less benefit in their activities. Finally, there are no strong indications that farm assurance has changed their awareness of animal welfare issues or the way they view the topic. Clearly the impacts of farm assurance are more evolutionary than revolutionary.
- 9. In considering the findings reported here, two things must be borne in mind. First, this was intended to be merely a broad ranging outline enquiry into the main aspects of farm assurance as seen from the producers' point of view; it claims to be neither complete nor definitive. However, in the absence of anything similar it has yielded what are considered to be useful indications from a key perspective on farm assurance. Second, the survey was conducted in late 2002; the scene has been developing rapidly since then, with farm assurance becoming more widely established and accepted practice, so that attitudes will undoubtedly have moved on and more producers may accept ownership of the concept.

# FARM ANIMAL WELFARE COUNCIL

# Survey of producers' attitudes to Farm Assurance Schemes, 2002

A. <u>BACKGI</u>	ROUND			
1. What live	estock types do you ke	eep? (tick as appropriate)		
Dairy	Beef cattle	Sheep	Pigs Poultr	y 📙
<ol><li>How big</li></ol>	is your livestock ente	rprise?		
Dairy	Beef cattle	Sheep	Pigs	
no. cows	no. finished	no. finished	no. finished	
	per year	per year	per year	
Poultry	Poultry			
no. produced	no. of eg	gs		
per year	produce	ed per year		
			-	
3. Are any o	of your livestock enter	rprises 'farm assured'?	YES	NO
4. If so, whi	ich types? (tick as app	propriate)		
		Sheep Pigs	Poultry	,
<ol><li>If you are</li></ol>	e NOT farm assured, v	why not? (tick all that appl	lv)	
no advantage	it's too costly	output too small	it's too complex	
organic producer	other reaso	on (explain)		
6. If you AF	RE farm assured, why	did you join the Scheme?	(tick all that apply)	
better selling pric				quality standards
other reason	(explain)			
			YES NO	approx how much?
Did you incur ext	ra capital costs to me	et the standards?		£
	ra annual costs to mee			£

7. Do you keep your livestock any differently now as a result of being Farm  YES  NO  NO						
If 'yes', in what way?						
B. YOUR VIEWS ON FARM ASSURANCE SCHEMES						
	a lot	somewhat	not much	not at all	don't know	
8. Farm Assurance schemes improve animal welfare  9. I have benefited from being 'Farm Assured'  10. Food consumers value 'Farm Assured' livestock products  11. Food retailers influence the welfare						
standards of Farm Assurance						
12. ALL livestock should be 'Farm As	sured'			YES	NO	
13. Non-Farm Assured livestock shoul	d receive	a lower price:				
		- at the fa			NO	
		- in the s	upermarket	YES	NO	
<ol> <li>How important are the following as</li> </ol>	spects of I	Farm Assurance S	chemes?			
	a lot	Somewhat	not much	not at all	don't know	
Formal animal health plans						
Annual rigorous inspections of farm premises and livestock						
Random inspections of farm premises and livestock						
Farmers and inspectors having a full understanding of animal welfare codes						
15. Please add any comments, information or opinions about Farm Assurance schemes and their impact on animal welfare as seen from the farmer's point of view						

THANK YOU VERY MUCH FOR YOUR TIME AND ASSISTANCE

# **APPENDIX C**

Mrs Meryl Ward

# MEMBERSHIP OF THE FARM ANIMAL WELFARE COUNCIL (MAY 2005)

Professor Christopher Wathes (Chairman)
Mr Robin Anderson
Dr Richard Bennett
Mr Ian Baker
Mrs Rosemary Berry
Mr John Don
Professor Peter English
Mr Graham Godbold
Mr Eddie Harper
Mr David Henderson
Mr George Hogarth
Professor Alistair Lawrence
Mrs Ruth Layton
Mr Stephen Lister
Mr Richard Maunder
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# **APPENDIX D**

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# FARM ANIMAL WELFARE COUNCIL: REPORT ON THE WELFARE IMPLICATIONS OF FARM ASSURANCE SCHEMES.

This report looks at farm assurance schemes in relation to the welfare standards experienced by the farm animals from which livestock products are derived. The recommendations in this report are addressed to all those involved in the food supply chain with the objective of strengthening commitment to animal welfare.

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