AHDB livestock sectors are heavily involved in the inclusion of animal-based measures in the respective Red Tractor Schemes, which evidences our belief that Assurance Bodies have an important role to play in ensuring high standards of welfare. As a joint owner of Assured Food Standards, AHDB is closely related to the Red Tractor Scheme. However, the response below is based on feedback from our levy payers and not limited to the Red Tractor Farm Assurance Scheme only - but as 95% of the dairy industry, 92% of the pig industry, 80% of beef cattle and 65% of sheep produced adhere to Red Tractor standards, this is naturally the most prevalent in our answers.

**Positive impact**

3. Examples of the positive impact of farm assurance on farm animal welfare might include increased inspection on farms; increased surveillance to reassure consumers; improved health, welfare and production planning; improved producer behaviour; and improved compliance with specific statutory and voluntary (scheme- or retailer-based) welfare standards. What other improvements to farm animal welfare do you think have been brought about since the advent of farm assurance schemes?

1) Pigs and Dairy (the latter to be decided): Inclusion of outcome based measures in the main Farm Assurance Scheme - emphasis on the animal’s demonstration of coping within its environment, rather than a checklist of environmental provisions.

2) Pigs - recognition of the importance of an enriched environment and on-going recommendations to ensure that objects are provided for enrichment, with recent changes to improve the quality of enrichment objects provided.
3) Pigs – quarterly vet presence on the unit identifies welfare as well as health issues (this will be standardised and expanded with the inclusion of outcome measures).

4) Where farm assurance scheme welfare requirements are understood by the public, animal welfare improvements can be driven by public opinion and consumer choice.

5) Pigs: continual improvement. Introduction of the Real Welfare scoring system into the Red Tractor pig scheme and linkage to a national database with aggregated scores means that the industry will continually improve. Units must take actions to improve their welfare scores if they have scores in the upper quartile of the industry-wide scores, which will be a moving figure as the industry addresses these issues.

6) A demonstrable commitment to levels of welfare.

7) Frequent reminder of standards (for example, at least once yearly before and during inspections in the pig industry and every 18 months in the dairy industry) ensures requirements and best practices are never far from farmers’ minds.

**Accreditation**

4. Technical advisory committees are in place in all assurance schemes and the system for updating standards seems to work. Are there any further improvements to these arrangements that might be made?

The TAC’s focus is to discuss standard setting for farm standards, and includes representatives from key players in the industry to provide the correct balance of expertise. There is scope to increase independent animal welfare input in the pig TAC (pig industry vets are often the main consultant); a wider range of independent welfare experts are included in the Dairy TAC. Animal welfare information has been sought through the AssureWel and Pig Real Welfare Projects.

When standards change then an agreed industry communication and consultation is required so that changes are not unexpected by industry. We suggest that the TAC is actively used as part of the communication plan. A targeted communication campaign should be delivered by each of the organisations sitting on the TAC. This will ensure that consistent key messages are delivered across the industry prior to implementation of changes, and demonstrate the support of the separate contributory organisations.

Whilst the proactive stakeholders are included in the TAC, there is a need to connect with the less proactive producers/farmers to encourage inclusion.
5. Updating assurance scheme standards is partly about knowledge application and the initiative of schemes in addressing current welfare issues. Is the time taken for FAWC (or other) recommendations leading to research that results in knowledge transfer and eventually to changes in legislation or farm assurance standards too long? Should farm assurance scheme providers be more active in addressing ongoing welfare issues, e.g. mutilations, bone fractures in hens, lameness in dairy cattle and sheep?

For credible inclusion of welfare assessments in a farm assurance scheme it must be accurate, scientifically evidenced and not over-burdensome. Inevitably, gathering this type of evidence takes time, as does implementation of the science into a scheme. Therefore, whilst there is a time lag between FAWC recommendations and recommended changes, it is important that this time period is sufficiently long to allow development of a robust and credible system.

However, given that the funding for these types of research are outwith an Assurance Body's remit or budget (unless perhaps they are part of a major retailers scheme), it is true that there is no existing mechanism for taking up FAWC recommendations unless DEFRA agrees to fund this specific research. Given the tight squeeze on DEFRA’s budget and the very limited availability of other research funding, there may be a desire from stakeholders to act on FAWC recommendations, but no means to act on them. This is an important issue that needs to be addressed, and may partly decrease the lag between FAWC recommendations and industry actions on these recommendations.

We are aware that to the general (farming) public, the time lag may seem disproportionately long, but underline the importance of a credible system as highlighted above.

Should scheme providers be more active in addressing on-going welfare issues? The Red Tractor Pig scheme uses veterinarians as an integrated part of assurance, which addresses overt issues such as health and welfare issues in its scheme, though until 1st of April 2013 not in a systematic manner (i.e. not recorded in a way that allows benchmarking). Dairy producers are required to maintain records of health and welfare issues including recording of clinical lameness cases, hoof trimming and treatment of lame cows. The Red Tractor Dairy Scheme has recently consulted the dairy farming community on a proposed set of outcome based welfare measures which include recording of lame cows using the DairyCo mobility scoring system.

In general, it may be possible to introduce guidance notes in response to more urgent issues, but farmers already perceive some assurance schemes to be burdensome, and there is a risk that introducing guidelines over and above requirements will be seen as over-burdensome and thus be counterproductive.
6. Do you have examples of research funding (leading to knowledge transfer) on animal health and welfare by retailers and farm assurance providers?

EBLEX recently partnered with Warwick University to research sheep lameness. Findings directly informed KT activity under the Better Returns Programme (BRP). Sainsbury’s have recently awarded a significant sum to a group of their pig farmers to develop husbandry systems that are seen to be higher welfare. AssureWel is a 5 year collaborative project funded by the Tubney Charitable trust, (involving the RSPCA, Soil Association and University of Bristol,) which aims to develop a practical system of welfare outcome assessment for the major farm animal species which can be used in farm assurance schemes. The Red Tractor Dairy Scheme is working closely with AssureWel and plans to implement the welfare outcome assessment in October 2013. Real Welfare (BPEX) has also been working closely with AssureWel; AssureWel have committed to using the Real Welfare definitions and protocols as the core measures within their pig assessments.

7. Achieving equivalence between standards has proved very difficult in the context of commercial interests. Wider EU and international standards might also diverge from UK standards. Should schemes be comparable domestically and across the EU to ensure a fair market? If scheme standards remain divergent, how could consumers be informed to assist choice? How would key assurance providers compare themselves with other schemes (including level of exports and how these are marketed)?

Should schemes be comparable? To be able to receive a premium on the product, there needs to be a way to distinguish between these. Farm Assurance schemes naturally are a good means to do so, provided the differentiating factor (and credibility of the scheme) are recognisable to the consumer. Currently, British farm assurance schemes are seen in the pig industry as a key way of differentiating on welfare standards in particular, which helps to ensure a premium in an international market (given that UK pig farmers’ costs of production are also higher than their European counterparts, this premium is necessary to maintain the industry). It is important however that there is no duplication or additional burden on farmers of inspections where they are not needed, which will also reduce risk of divergent interpretation of standards by different assessors. The Red Tractor Dairy Scheme collaborated in an industry meeting to discuss the technical content of welfare outcome assessment and agree on a joined up strategy going forward to improve dairy cow welfare as an industry together.

Some farmers in the Red Tractor pig scheme perceive that they have far more to do to achieve assured status than those in other sectors (increased paperwork requirements etc.).
If standards were to be equivalent across EU, EU standards should be raised to reach current Red Tractor standards, otherwise welfare of a large population of animals will be compromised. The Red Tractor standards are open to producers in other countries, but thus far no foreign product carries the logo.

How should consumers be informed? A large number of different assurance schemes is undesirable as it is likely to dilute the message from each individual scheme. A successful scheme relies on consumers being able to recognise the logo and to know what it means. This requires significant investment both in money and time. Farmers are not generally in favour of individual retailer assessments (as opposed to a single farm assurance assessment) as they may supply pigs to several retailers and would be reluctant to undergo multiple assessments per year especially if different standards would be required by different retailers; increasing the number of visitors to a unit is also recognised as an increased risk to biosecurity of a unit.

8. Transparency was a main recommendation of the 2005 FAWC report and is needed to show how effectively assurance schemes are working. Anonymised compliance data could be used. While there are examples of publication of compliance data (e.g. Red Tractor Report 2012) and data sharing with researchers (e.g. University of Warwick), can more be done to release data from schemes that could assist policy makers and the public?

Yes – more could be done. There is a current concern in pig industry that not enough consumers understand what the farm assurance badge means (even though the logo is recognised). Also not everyone (in the industry) realises that “farm assured” and “Red Tractor” are directly interchangeable as a national scheme. There is a need for clearer use of the terms to promote understanding to both industry and consumers. Compliance data showing how many units visited, proportion compliant, proportion receiving advice, proportion non-compliant, and proportion removed from the scheme would be reassuring. Industry wants to know that the badge and compliant status are recognition of high standards that not everyone else can achieve.

Red Tractor has an agreement with DairyCo to share anonymous data that is used to demonstrate industry trends. Red Tractor have also been proactive in sharing data with researchers at the University of Bristol as part of a DairyCo funded project. Red Tractor has also shared data with researchers from SRUC as part of a DEFRA-funded project on continuous housing of dairy cows.

However, despite reassurances from Red Tractor that individual Real Welfare scores will not be released, there is still a concern from pig producers that sight of their scores will be ‘demanded’ by supermarkets they supply. So whilst data sharing and openness is to be encouraged, extreme care should be taken to avoid scenarios
where individuals could be identified (unless they themselves choose to make their scores public). Also there is a need for Assurance bodies and retailers to support individual producers – and the industry as a whole - if they are being put in a position where they have to defend themselves.

**Assessment/Audit**

9. Our 2005 report called for a greater focus on animal based measures in farm assurance standards and inspections for which inspectors have the capability to observe and judge these outcomes. We are aware that the pig red tractor scheme is currently adopting welfare outcome measures into its standards and inspection regime for Spring 2013. AssureWel is a 5 year (2010-2015) collaborative project led by the RSPCA, Soil Association and the University of Bristol. Its main aim is to develop a practical system of ‘welfare outcome assessment’ for the major farm animal species.

10. Is there potential for more use of welfare outcome measures in farm assurance inspection, alongside other input measures (including the stockperson’s ability to assess animal health and welfare) and are inspector skill levels able to keep up?

EBLEX is convinced there is great potential for this. These need to be identified as specific projects first and then training needs can be assessed and tackled.

There is scope to include outcome measures on all groups of pigs in farm assurance schemes, ensuring an animal’s whole life is covered, provided that these are scientific and robust (rather than consumer-lead). All outcome measures can be described in objective terms to give a yes/no answer at individual animal or pen level. Indeed there have been suggestions as such from pig producers themselves that sows should receive outcome scoring as well as finisher pigs.

Although in the Red Tractor Pig scheme veterinarians are used to collect Real Welfare data, once the initial vet training has been completed, it is proposed that inspectors are invited undergo the same training as the vets, to help keep the scheme transparent. Field managers (responsible for several units within a production system) and farmers themselves are also encouraged to familiarise themselves with the measures and can be formally trained if they wish (only data scored by trained veterinarians will contribute to the national database, unless this is formally changed in the Red Tractor Assurance Standards).

There is however also a strong belief amongst pig farmers that pig assurance is already cumbersome and adding any new measures (to the Red Tractor assurance scheme at least) must be on a ‘one in, one out’ basis.
The Red Tractor Dairy Scheme has just completed a consultation to the dairy farming community on the proposed implementation of outcome based measures into the scheme in autumn 2013. This proposal includes a set of outcome based measures that the farmer will be asked to score every six months. The assessor will score the outcome based measures on a sample of cows during their visit (every 18 months). The proposal focuses on the lactating dairy cow but there is scope to extend this to youngstock once the evidence based research has been conducted to provide a robust set of outcome based measures that are suitable for youngstock.

**Supply side**

11. FAWC’s Opinion on Lameness in Sheep and Report on Farm Animal Welfare: Health and Disease both contain suggestions about better assessment by stockpeople and of stockpeople. With livestock transport drivers and attendants and (soon) slaughterhouse workers in contact with live animals required by law to undergo training and attain certificates of competence, will farm assurance schemes look further at their requirements for the training and assessment of stockpeople?

Red tractor pigs will be improving requirements for stockperson training and competence; and have specifically included welfare in these sections:

- SC.1 (Rev) staff training plans must cover animal welfare.
- SC.1.1 (New) Recommending that staff/workers demonstrate their competence by being a member of a recognised scheme that records skills/development/training activity such as PiPR (the Pig industry Professional Register).

12. Farm health and welfare plans were recommended by the 2005 Report. Many farm assurance schemes do require that plans be completed although there is some concern that these have become tick-box exercises in their current format. The recent FAWC Report on Farm Animal Welfare: Health and Disease concluded that an active and ongoing process of health and welfare and business planning with veterinary and other expert input will improve health, welfare and productivity. Are there any plans to develop health and welfare plans further within farm assurance?

It seems to be widely perceived that farm assurance has become a tick-box exercise, as is the notion that (at least some) auditors are ‘out to find something’. (Veterinary) Health plans are already an integral part of the major assurance schemes and likely to remain a key factor in the provision of evidence of adherence to standards. Vets and farmers will be required to update the VHP with actions resulting from poor Real Welfare scores in order for a unit to remain compliant. We are aware of suggestions from Red Tractor to update parts of the Veterinary Health Plan (pigs), but do not know how or when this will develop. There is some suggestion that the original templates supplied by the major schemes are too basic for most farm needs, suggesting that the Plans are indeed well used. Larger pig vet practices have developed their own templates which may be more relevant.
13. FAWC recommended that retailers and the food service sector should show leadership and apply consistent animal welfare standards to domestic and imported animal products and offer information to their customers. Has there been progress on these recommendations?

This question is not entirely clear.

Supermarkets have in the past put the onus of the correct provenance of products with their suppliers. The recent horsemeat investigation has seemingly shifted this responsibility closer to the retailers; the hope is that this forces the supermarkets to be clearer in the promotion of the provenance of their products in order to maintain consumer faith in their brand. The recent decision from Sainsbury's to drop the Red Tractor logo from their products is disappointing and a step backwards in their level of information to the customer (however, AHDB sectors are working hard to make suppliers to this retailer aware that the Red Tractor standards are still required, it's just that the logo will not be present).

Standards such as Red Tractor, Freedom Food and the organic schemes all have animal welfare as a core, if not unique selling point.

There is currently concern in the pig industry that supermarkets are selling cheaper imports which are not be produced to the minimum legal standards adhered to in the UK. Whilst pig meat from the continent is produced at lower cost than (most) pig meat in England, recent changes in legislation should have reduced this difference in cost, requiring new standards likely to incur higher production costs in the rest of the EU, aimed at improving welfare (e.g. ban on individual sow housing).

As a consumer - welfare information is often lacking in the food service sector - some outlets will advertise how local their product is, and sometimes a description of the housing; the majority of large chain outlets do not provide this information on menus, and staff are unlikely to know the information. Brands such as Red Tractor or Freedom Food are very rarely indicated. There is still scope to improve the information in large food outlets.

14. FAWC's report recommended that assurance schemes include all categories of farm animals, including low value animals. Are there categories of animals which are not covered by farm assurance schemes, e.g. breeding animals and minor species, or areas of production that are less well covered? If so are there plans to include these?

The current Red Tractor assurance scheme has standards covering low value animals such as bobby calves, casualty and fallen stock. Low value animals such as
cull sows, piglets and animals in hospital/recovery pens are also covered in Red Tractor assurance standards.

Welfare outcome protocols, such as Real Welfare and the DairyCo scheme are only introduced – at present – in a specific group of animals. Younger meat animals, and breeding stock (both sows and boars) are currently not included in the pig scheme (although dry sow measures have been piloted successfully); young stock and bulls are not currently included in the dairy scheme.

Organics

15. The 2005 report was concerned that organic production should not have a negative impact on welfare. It recommended research and review of the health and welfare impact of organic production in terms of disease and parasite prevention and treatment. What have been the results of research in this area?

16. FAWC recommended guidance on conversion and on-going assessment of farmers entering organic production in terms of conversion needs, health planning, stockmanship, parasite control, medicine use, vaccination and genotype suited to environment. What progress has been made in the provision of this guidance?

Demand side

17. Retailers have a great deal of power in the food chain sourcing both home produced and imported food. The 2005 report recommended that welfare standards should be applied across all ranges of fresh, frozen and processed food both domestically produced and imported. To what extent has this been achieved?

18. Consumer research shows that many consumers see animal welfare as part of a package of food quality criteria. Is animal welfare being explored as a part of a food quality mix to ensure consumers are given some information on this aspect? Are retailers seeking to build consumer trust with differentiated supplier standards?

We are aware that it is difficult, and sometimes counterproductive, to promote important areas of animal welfare to consumers – in some cases increasing awareness of commercial practices would conflict with public understanding of how animals are reared. On the other hand, better understanding would lead to more informed choice – even though this risks initial losses to industry. Some consumers buy entirely on price/value whatever information is provided. We are aware that retailers differentiate within their range, but assured meat can be found in all price ranges.

19. There are some indications of market share decreases in niche schemes (with some exceptions) and divergence in the schemes being put in front of consumers from assurance providers and increasingly the retailers. Are these developments
likely to reduce the impact on improving farm animal welfare and add confusion to the market? Is there still sufficient premium available to fund production system improvements required by assurance schemes?

This is a concern, as highlighted before, however, there is a recognition that assurance schemes can and should be used to differentiate a product. Communication to customers is a key part, and relies on involvement of all of those in the supply chain.

20. Public sector procurement standards should be at the highest level of farm animal welfare and, if not, then should be labelled as such. There are food quality overlaps between animal welfare, environmental impacts, food safety, etc., all of which are targets of government policy and should be reflected in the mix of purchasing criteria. PSPFI is a key scheme in this respect. Has there been any progress in increasing welfare standards in public food procurement policy? Defra may wish to co-ordinate a response to this question with government colleagues.

EBLEX has been working for some time, with limited success, to get guidelines on public sector procurement insisting on assured beef and lamb. The recent horse meat scandal has brought this debate to the fore again and some quarters are removing non-assured products and looking to source assured products. EBLEX has written to all members of the Local Authority Caterers Association (LACA) (500-plus local authority, school and catering members in the UK) to highlight the value of using meat produced as part of the Red Tractor assurance scheme, as well as its own Quality Standard Mark (QSM), and offer help in sourcing assured product.

We were very pleased with the explicit inclusion and promotion of Red Tractor meat to Olympic and Paralympic athletes and spectators in 2012. A longer term drive to maintain this awareness and promotion and expand uptake would be invaluable.

21. The Farming Regulation Task Force Report in 2011 highlighted the potential for farm assurance and other certified scheme membership to contribute to focusing Government on reducing inspections to those at low risk of non-compliance and instead focus more on those at higher risk of non-compliance. The Government response (February 2012) and the Task Force update (December 2012) reported on how farm-assurance membership contributed to a reduced risk of selection for the statutory welfare inspections carried out by Government agencies. Do you think this approach with farm assurance and other schemes is a positive step forward and have you seen any impact on farm animal welfare by using this approach?

This makes perfect sense and targets resources and reduces duplication. As such there should be concurrent increases in animal welfare as targeted inspections become more sensitive and risk based.

This is without doubt a positive step and vocally appreciated by pig farmers (when aware of it). Recent Red Tractor road shows informing farmers of changed requirements on animal welfare have highlighted this. Red Tractor have tentatively committed to assessing whether it is possible to introduce a similar system for
welfare inspections themselves (which would need to be validated with a robust data set). It allows resources to be focussed on units which need advice, and reduces work, time and cost on units which are following and exceeding requirements. It also provides extra reassurance that those that are perhaps not up to the standards are more likely to be dealt with.

It is pleasing to know that membership of a farm assurance scheme will be introduced in the AHVLA inspection risk model, and this type of data sharing is to be encouraged. Similarly, pig farmers are appreciative of the reduced government inspections and Environment Agency inspections that result from being Farm Assured (when made aware of this benefit).

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

22. Welfare Assurance Schemes should be continually looking for improvement of their standards, through their technical committees. Some suggestions of animal welfare issues that they could address in future might include the list below, what would be your view of these suggestions?

The majority of these issues will be addressed by good stockmanship (the value of which is already recognised and being addressed in the standards) which results in effective management of each of these issues, either through proactive approaches to reduce known risks, or well prepared contingency plans where risks cannot be avoided entirely. There may also be a role for paraprofessionals in assessing these measures. Whilst genetics may have a role in addressing some of these issues, it is suggested that this is a minor role in comparison with the importance of stockmanship. Where the standards do address any of these issues, advice, compliance etc. must rely on robust science, and cost-benefit analysis should be carried out to ensure proportionate responses and reaction to the issues. Where research has not already been completed it is not clear who would pay for research underpinning most of these topics, as highlighted in point 5.

a) Reducing losses of new-born pigs on outdoor units in extreme weather conditions.
   + contingency plans for extreme weather to safeguard welfare of outdoor sows (e.g. feed provision, water supply)

b) Reducing deaths of new-born pigs through over-lying and savaging in more extensive systems.

c) Access to suitable means for on-farm euthanasia (e.g. captive bolt gun) and demonstrable competency in their use.
   EBLEX is currently discussing this at Beef and Lamb Technical Advisory Committee and recommended it is added to the inspection list, i.e. the farmer knows the rules and can demonstrate verbal competency. Assessors will need some training also in this case. Being addressed in Pigs scheme.
Majority of dairy farmers contract veterinary surgeons or external personnel registered by the Human Slaughter Association to euthanize bull calves, casualty and fallen stock.

d) Improved recognition of disease challenge by stockpeople and greater involvement of vets on farm for prevention, correct diagnosis and treatment of disease.

BRP work on health planning is already looking at this. Assurance schemes could look at promoting farmers to engage with qualified and certified paraprofessionals (e.g. Licenced foot trimmers certified by the National Association of Cattle Foot Trimmers; and licenced slaughter personnel certified through the Humane Slaughter Association; certified artificial inseminators etc.)

e) Ensure the breed of animal fits the production system and collaborate with research to ensure these breeds are available.

This is being looked at already by both BRP and R&D activity within EBLEX, and within DairyCo R&D.

f) Effective contingency planning to protect farm animal welfare in emergencies and participation in local emergency networks.

This has a clear place in assurance. The Red Tractor Dairy Scheme has a standard covering emergency plan should be available and accessible to all staff.

g) Participation in educational initiatives incorporating farm animal welfare.

Should be the result of an industry-led collaborative approach

h) “Animal welfare outcome safeguards should be incorporated into industry, private and other assurance and certification procedures associated with animal welfare claims. A summary of information on important welfare outcomes should be freely available to consumers.” (FAWC 2011 Report on Education, Communication and Knowledge Application)

i) Promote knowledge exchange initiatives in farm animal welfare.

BRP covers this.

Should be the result of an industry-led collaborative approach

j) Surveillance of lameness in sheep and promotion of effective control plans with the aim of reducing prevalence of lameness in sheep.

Research activity and subsequent BRP work

k) Surveillance of the use of tail docking in pigs; encouraging reduction in all mutilations of pigs and not accepting castration in home produced or in imported products. If mutilations are required then operators should be demonstrably competent and pain relief encouraged.

Tail docking is of public concern. “Pain relief encouraged” – “encouraged” is not a useful term - if there is scientific backing to support the improved welfare of piglets, pain relief should be required and best practice information presented, otherwise there will be no uptake - at the moment pain relief in this procedure is seen as impractical and is unlikely to be carried out unless there is external pressure. Currently pain relief is not considered practical due to increased handling time/distress to animal and increased handling time for operator - pain relief cannot be encouraged until there is a practical solution or regulation. Units which would consider use of pain relief are probably units
which are already applying environmental improvements as an alternative to tail docking.
(Needs to be greater confidence within industry that tail docking is not required in all current situations, e.g. practical and proven measures to apply should tail biting happen.)

l) Assurance schemes should have clear communication strategies which enable consumers to understand and compare the relative merits of schemes. Improved communication is a current aim of Red Tractor, and it is definitely a good time to promote better understanding of what farm assurance means to the wider arena.

m) Surveillance of bone fractures in laying hens and encouragement of improvements through system design and management, nutritional, genetic and other solutions generated by research.
A valid issue - Units which continually fail to address these iceberg indicators of inappropriate housing and/or management (i.e. tail biting in pigs, lameness in dairy cattle) are failing to house animals in a way that is acceptable to the majority of the industry and to consumers; non-compliance in these issues should be a priority for scheme level action. Whilst tolerance and support within the industry are appreciated, the farm assurance standard has to represent only units which have a level of welfare that the industry is proud to support.

Ends