

Submission to the National Food Strategy Independent Review

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Key recommendations

1. Institute an animal welfare labelling system.(method of production labelling)
2. Government procurement to drive the shift to a high welfare British farming industry.
3. Government funding to mitigate the costs to consumers and farmers of increasing welfare standards.

Introduction

Britain should move away from industrialised farming which focuses on producing low-cost food at the cost of immense cruelty to animals, risks to public health and environmental destruction.

British farming cannot compete on cost alone. In a post-Brexit world, quality and high animal welfare must become part of Britain's international brand. And the government has the objective for Britain to have the world's best animal welfare standards.

This is best achieved through a mandatory animal welfare labelling system. All animal-derived products (including imports) would be required to indicate the level of animal welfare used to produce them, including method of slaughter.

Consumers, armed with this information, would make informed choices that will drive welfare improvements across the farming industry.

The government would procure only high welfare products. It would also educate the public about the merits of switching from low welfare to high welfare products and avoiding environmentally damaging products. It would encourage less and better meat and dairy consumption and increased consumption of plant-based food to improve public health and protect the environment.

The costs involved in moving to higher welfare standards should not be borne by farmers or consumers. As a public good, the government should bear the cost of better welfare standards.

This combination of financial assistance to transition, increased demand from informed consumers and protection from low-welfare imports will ensure the health of the British farming industry.

Animal Welfare Labelling (Method of Production Labelling)

Animal welfare standards are too low. More people are embracing vegetarian principles and the switch from battery cage to free range eggs is evidence of the public's concerns.

The time has come to allow consumers to make informed choices through a system of animal welfare labelling to be applied to all food products sold or used in the United Kingdom. There would be two levels:

- SILVER would be a minimum level of humane animal husbandry practice
- GOLD would be based on the current best practices being followed by producers who rear animals in high welfare conditions.

The label would consist of a small silver or gold animal that would be placed on all animal products sold or produced in the United Kingdom.

Imports

A clause requiring imports to meet UK animal welfare standards would be included in any trade agreements to avoid British farmers being undermined by low welfare imports.

Husbandry Practices

Appendix I sets out of the husbandry practices which are currently permitted and the proposed Silver and Gold labels. Some of the changes we are seeking include:

1. Phase out intensive farming systems such as battery hen cages and pig farrowing crates.
2. End mutilations such as beak trimming, castration without pain relief and pig tail cutting.
3. End male chick maceration and dairy calf culling at birth.
4. End the CO₂ gassing of pigs.
5. Reduce grain-reliant livestock feeding.
6. Halt the zero- grazing of cows and provide incentives to keep cows in pasture-based systems.
7. End live exports for fattening and slaughter

In addition to these species-specific measures, antibiotic use in animal husbandry should be reduced as a means of reducing risk to human health. Higher welfare with less crowding should assist in the reduction of the routine use of antibiotics.

Regulatory System

The Food Standards Agency would implement the new labelling regime through:

1. Enforcement of the Animal Welfare Act 2006 and any subsequent legislation.
2. Accreditation, assurance and audit of animal products producers and processors in the UK and imported goods
3. Audit of government authorities to ensure Gold label purchasing

Government Procurement

The government through its procurement power should take the lead and set the standards for animal welfare.

The public sector spent £2.4 billion in 2014 on purchasing food and drink, of which £600m was imported (*"A Plan for Public Procurement"* Dr Peter Bonfield, DEFRA 2014, p7). Of this, we estimate that £1 billion was spent on animal products.

Substantial government purchases in combination with a gold label allowing consumers to make informed choices would turbocharge the development of a high animal welfare industry, particularly among small farmers.

Funding

Higher welfare would increase farmers' production costs and the price of food for consumers and the government.

1. Government should assist farmers to move to higher animal welfare through a mix of:
 - a) Direct funding of new farm infrastructure such as high welfare barns and off-farm infrastructure such as slaughterhouses
 - b) Payments through whatever system replaces CAP payments
2. Government should compensate consumers for the costs of moving from current standards to the silver standard, possibly through changes to income tax thresholds etc.

3. A move from the silver standard to the gold standard by consumers is discretionary and there is no need for government to fund this.
4. Government procurement of high welfare products will increase costs. However, these cost increases could be moderated by changing the mix of animal products and fruit and vegetables, as has been achieved by institutions in the United States and Scandinavia.

Cost & Cruelty Matrix

The government should assess the economics of shifting to higher welfare levels. It should develop a matrix which compares the costs of changing husbandry practices against the cruelty of those practices.

Other Recommendations

Other practices that involve cruelty or destruction of the natural environment are common. The review should consider bans on:

1. import, consumption and use of shark fins and other exotic or endangered animals
2. cooking seafood alive (such as boiling lobsters)

Conclusion

Our food culture gives great weight to low prices. However, the public is increasingly concerned about how low-cost low welfare animal products impact upon animal welfare, the environment and public health. A new food culture including a labelling system must be created which cares about the nutritional quality of food and values farming methods that protect the environment and animals.

APPENDIX I - Summary tables of the husbandry practices required to achieve each label by species

These animal husbandry standards have been drawn up in consultation with Philip Brook of Compassion in World Farming.

I. Dairy

	Current Minimum Standard	Silver (Minimum acceptable standard)	Gold (World best practice)
Standards which must be met in entirety		RSPCA-Assured. Organic optional.	RSPCA-Assured. Pasture for Life Organic optional
Milk Yield p.a.	No limit. The average is around 8000 litres.	No more than 7000 litres.	No more than 5000 litres
Stocking density – Housing		At least 20% more cubicles than cows. Access to outdoor yard required. Well-managed straw yard systems preferred. Where cows are kept in open-air yards, up to 11 m ² /cow according to size (see RSPCA standards).	Cubicle systems not permitted. Straw yards as silver. Access to outside yard required.
Stocking density – Pasture		No more than 12 cows/acre	1.5 cows/acre
Feed	Forage level may drop to 50% DM (Dry Matter)	At least 60% forage DM	Entirely grass-based (as in PFLA standards)
Pasture access/Housing	Grazing commonly available in season/Some continuously housed. Bedded cubicle systems the norm, sometimes with fewer cubicles than cows.	Grazing 4 to 5 hours/day throughout the grass-growing season or Indoors with straw/woodchip or similar bedding	Grazing throughout the grass growing season and open fronted straw yards for shelter. Cows should have continuous access to housing (or well-sheltered woodland with dry lying areas) as well as pasture.
Breed		Lower yielding genetic. Cows must be able to maintain condition and production on a pasture-based diet.	Lower yielding genetic. Cows must be able to maintain condition and production on a diet based entirely on grass and other vegetation without cereals
Tethering	Permitted, though rarely practiced.	Not permitted	Not permitted

Dehorning	Yes, but usually disbudding with pain relief	Disbudding with pain relief permitted	No. Either fully horned or bred to be hornless (polled)
Castration of male calves	Yes. May be carried out on young animals without pain relief	Castration permitted with pain relief	No castration
AI	standard	Standard	Natural mating
Age of calf removal	<24 hours- few days	1 month minimum	Calves reared either by their own or by a surrogate mother until at least 2 months old. Ideally, calf at foot dairying with weaning permitted from 4 months
Excess calf policy	Commonly sold for beef, occasionally veal, production. Quite commonly shot; sometimes sold for veal or beef export	Reared for rose veal/beef in the UK	Reared for rose veal/beef on the farm where born. May move to another nearby farm after weaning
Transport of cull cows and calves	Often > 8 hours from farm to slaughter or further fattening	< 4 hours for slaughter or further fattening	< 4 hours direct to slaughter and < one hour for further fattening
Export (fattening or slaughter)	Permitted	Not permitted	Not permitted
Welfare outcome measures	Measurement of cell counts, lameness and body condition common	Follow Assurewel protocols	Follow Assurewel protocols. Must meet improving targets to reach level.
Religious Slaughter	Permitted with or without stunning	Permitted with stunning	Not permitted.

2. Beef Cattle

	Current Minimum Standard	Silver (Minimum acceptable standard)	Gold (World best practice)
Standards which must be met in entirety		RSPCA-Assured and/or organic	RSPCA-Assured. Pasture for Life (not required for dairy beef).
Stocking density	3.5 sqm for finished animal @<500kg when housed	7 sqm for finished animal @ <500kg when housed. Sufficient pasture to provide 60% of their feed during grazing season.	9 sqm for finished animal @ <500kg when housed. Must have sufficient pasture available to provide their feed and maintain good condition. Forage can be preserved outside grazing season
Feed	Forage/concentrate	Pasture based/concentrate. Minimum 60% forage.	Pasture based supplemented with preserved grass in winter. Some concentrate permitted provided 60% forage rule still followed.
Housing	Indoors. After 6 months old may be housed on slatted floors without bedding	Grazing when conditions allow, housed indoors on straw/woodchip or similar bedding. May be 'finished' indoors Dairy beef may be reared in higher welfare indoor systems	Grazing all year with shelter. May be housed indoors in winter if necessary. No indoor finishing, unless in winter.
Tethering	Rarely practiced	Not permitted	Not permitted
Breed	Beef breeds may have 'double muscled' beef breed	Beef suckler, dairy or dairy-beef cross.	Beef suckler or calf-at-foot dairy, polled or horned, robust breeds with high locomotion score and adapted to free-range conditions
Cycle/Calving	Continuous or seasonal	Seasonal if beef breed, may be continuous if dairy beef	Seasonal
Reared with mother	No	Yes, if a beef breed until 8 or more months of age, 1 month if dairy beef	Yes, until natural weaning if beef breed, till 4 months if calf-at-foot dairy

Castration /Dehorning	Yes	Yes, but with pain relief. Disbudding, not dehorning	No dehorning. No castration
Transport/ slaughter	May be moved multiple times during life. Standard slaughter	Beef breeds reared on farm, standard slaughter practice. Dairy beef animals may be moved once.	Reared on farm, transport short distance (<1hr) or slaughter on farm.
Export under 6 months	Permitted	Not permitted	Not permitted
Export over 6 months	Permitted for fattening	Not permitted	Not permitted
Religious Slaughter	Permitted with or without stunning	Permitted with stunning	Not permitted

3. Broiler Chicken

	Current Minimum Standard	Silver (Minimum acceptable standard)	Gold (World best practice)
Standards met (NB There are additional requirements for higher levels)		RSPCA-Assured EU free-range or organic	RSPCA-Assured Either EU traditional free-range or free-range total freedom requirement
Stocking density kg/m²	39	27.5	21
Minimum slaughter age (days)	No restriction, commonly 32 (first thin) – 40	56	81
Flock size (birds)	No restriction, 30,000 common	Less than 4000	Less than 500 (Consider allowing more with winter garden/veranda)
House type	Deep litter. Most now include windows to provide natural light.	Barn meeting UK legislative requirements incorporating natural light and pop holes onto range	Small mobile ark 4m pop hole length/100 sqm of floor surface A good alternative for a static shed would be the requirement of a veranda/winter garden
Breed	Fast growing (>50g per day on average)	Slower growing (<50g per day on average)	Slow growing (<35g per day on average)
Indoor enrichments	Beyond litter provision, which is mandatory, none required. Natural light through windows and straw bales and perches and pecking objects required now or shortly by Red Tractor	Natural light, straw bales, perches, pecking objects	Natural light, straw bales, perches, pecking objects in static shed. Not required in mobile arc.
Range access and area/	None	Continuous daytime access to open air run, and at least 1sqm/chicken	Continuous daytime /24hr access to open air run at least 2m ² /chicken
Range vegetation	N/A	Mainly covered by vegetation	Trees and bushes to provide shelter and shade
Catching/ Slaughter	Standard leg catching of ≤6 birds at a time and module transport to slaughter plant, gas or electric stunning.	Ideally kept upright and handled one or two at a time. gas or electric stunning. No thinning	Individual handling at catching. Short distance (<1hr) or on farm slaughter with gas stunning. No shackling of live birds permitted if transported to

	Thinning permitted		slaughter plant. No thinning.
Religious Slaughter	Permitted with or without stunning	Permitted with stunning. Stunning currents should meet EU requirements for non-religious slaughter, but with a maximum frequency of 800Hz	Not permitted

4. Egg laying hens

	Current Minimum Standard	Silver (Minimum acceptable standard)	Gold (World best practice)
Standards		RSPCA-Assured free-range EU free-range or organic	RSPCA-Assured free-range EU free-range or organic
Stocking density cm²/hen inside housing	750	1111	1667
Flock size (birds per group)	No restriction. Can be hundreds of thousands in tiers of cages	4,000	< 500
House type	enriched/ colony cage	Barn meeting UK legislation with pop holes allowing access to range. Any new barns should have aerial perches meeting RSPCA requirements as well as dust-bathing areas and laying nests. Perches 15cm/bird. Litter covers a third of the floor surface.	Mobile ark 1 nest box/7 birds, perches 15 cm /hen & litter 250 cm ² /hen, 4m pop hole length/100 sqm of floor surface Or Larger house (as silver) with a veranda or winter garden to encourage ranging
Breed	No restriction	Breed shown to have good welfare characteristics on range	Dual-purpose breed shown to have good welfare characteristics on range. Potential to lay no more than 220 eggs per year unless it meets strict welfare protocol. Male chicks reared for meat.
Pullets		Future requirement to rear free-range from 12 weeks old	Reared free-range from 12 weeks old
Male chicks	Usually slaughtered at hatching by maceration	Slaughter not permitted. Raised for meat	Slaughter not permitted. Raised for meat
Beak trimming	Yes	No	No
Range access and area/	N/A	Continuous daytime access to open air run, and at least 1sqm/chicken	Continuous daytime access to open air run, and at least 2sqm/chicken
Range vegetation	N/A	Mainly covered by vegetation. Should include some trees and bushes	Trees and bushes to provide shelter and shade. Unless entirely wooded, part of range must have some ground vegetation

			which can be achieved using rotation
Brooding	Separate rearing farm	Dark brooding systems at rearing farm	Dark brooding systems at rearing farm
Catching / Slaughter	Standard leg catching of ≤6 birds at a time and module transport to slaughter plant, gas or electric stunning	Standard leg catching of 2 birds at a time and module transport to slaughter plant, gas or electric stunning	Individual 2-hand handling at catching. Short distance (<1 hr) or on farm slaughter with gas stunning. If slaughtered away from farm, no shackling before gas stunning
Religious Slaughter	Permitted with or without stunning	Permitted with stunning. Stunning currents should meet EU requirements for non-religious slaughter, but with a maximum frequency of 800Hz	Not permitted.
Welfare outcome measures	Measurement of lameness and body condition common	Follow Assurewel protocols	Follow Assurewel protocols

5. Ducks

	Current Minimum Standard	Silver (Minimum acceptable standard)	Gold (World best practice)
Standards which must be met in entirety		Red Tractor plus EU free-range	RSPCA-Assured plus Either EU traditional free-range or free-range total freedom requirement
Stocking Density (kg/m²)	17-24.5 according to weight of bird	17	14
Slaughter age (days)	no limit	49 (Pekin breeds)	81
Flock size (birds)	20,000	4000	Less than 500
House type	Deep litter	Deep litter shed with pop holes onto range	Small mobile ark 4m pop hole length/100 sqm of floor surface
Breed	Peking/Muscovy	Peking/Muscovy	Slow-growing strain
Water provision	Water provided for drinking. Most UK producers also provide it for bathing and preening (Red Tractor requirement).	Water troughs or baths/showers to enable bathing and preening	Access to water for swimming
De-billing	Yes, for Muscovy, no for other breeds except for breeding flock	No	No
Range access and area/	N/A	Continuous daytime access to open air run, and at least 2sqm/duck	Continuous daytime access to open air run. At least 2m ² per duck
Range vegetation	N/A	Mainly covered by vegetation	Trees and bushes to provide shelter and shade. Open areas should also be available.
Catching / Slaughter	Max 2 ducks per hand, supported under body required by Red Tractor	Max 2 ducks per hand, supported under body	Individual handling at catching. Short distance (<1 hr) or on farm slaughter with gas stunning
Religious Slaughter	Permitted with or without stunning	Permitted with stunning. Stunning currents should meet EU requirements for non-religious slaughter, but with a maximum frequency of 800Hz	Not permitted

Welfare outcome measures	Condition of eyes, nostrils, feet, cleanliness and feather cover commonly measured	Condition of eyes, nostrils, feet, cleanliness and feather cover should be measured	Condition of eyes, nostrils, feet, cleanliness and feather cover should be measured
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6. Turkeys

	Current Minimum Standard	Silver (Minimum acceptable standard)	Gold (World best practice)
Standards which must be met in entirety		RSPCA-Assured plus EU-free-range	RSPCA-Assured plus Either EU traditional free-range or free-range total freedom requirement
Stocking Density (kg/m²)	No legal requirement. Red Tractor permits 17.3-59.1 according to weight of bird	25	25
Minimum slaughter age (days)	varies with size	70	98-140 according to use
Flock size (birds)	20,000	Less than 4000	Less than 500
House type	Deep litter	Deep litter barn incorporating natural light and pop holes onto range	Small mobile ark 4m pop hole length/100 sqm of floor surface
Indoor enrichments	Beyond litter provision, which is mandatory, none required. Natural light through windows and straw bales and perches and pecking objects required now or shortly by Red Tractor	Natural light, straw bales, perches, pecking objects	Natural light, straw bales, perches, pecking objects in static shed. Not required in mobile arc.
Breed	Fast growing BUT type	Slower growing bronze Kelly type	Slow growing type
Light intensity	10 Lux	Natural light	Natural light
Beak trimming	Yes	No	No
Range access and area/	N/A	Continuous daytime access to open air run, and at least 4 sqm/turkey	Continuous daytime /24hr access to open air run. at least 6 sqm/turkey and 10 m ² in rotation
Range vegetation	N/A	Mainly covered by vegetation	Trees and bushes provide habitat
Catching / Slaughter	Standard leg catching into modules (both legs or leg and opposite wing), gas or electric stunning	Standard leg catching into modules (both legs or leg and opposite wing), gas or electric stunning	Individual handling at catching. Short distance (<1hr) or on farm slaughter with gas stunning
Religious Slaughter	Permitted with or without stunning	Permitted with stunning. Stunning currents should meet EU requirements for non-religious slaughter, but	Not permitted

		with a maximum frequency of 800Hz	
Welfare outcome measures	Measurement of lameness and body condition common	Follow Assurewel protocols	Follow Assurewel protocols

7. Breeding Pigs

	Current Minimum Standard	Silver (Minimum acceptable standard)	Gold (Government procurement)
Standards which must be met		RSPCA-Assured or organic. Meets free-range voluntary standard	RSPCA-Assured or organic. Meets free-range voluntary standard.
Litters/sow/year	2.2	up to 2	up to 2
Breed	Landrace or similar	Robust breeds with sustainable litter sizes	Robust breeds with modest litter sizes
Artificial Insemination	Permitted	Permitted	Not permitted
Weaning age	4 weeks. 3 weeks permitted in all-on all-out systems	8 weeks	Natural weaning
Housing	Indoors on slatted floors or concrete	Outdoor huts on pasture with straw and woodchip for bedding. Provision of wallowing areas on range	Outdoor huts on pasture with straw and woodchip for bedding. Provision of wallowing areas and trees and shrubs on range
Stocking density	2.25 m ² /sow	15 sows/hectare	10 sows/hectare
Farrowing crates	Yes	No	No
Tail docking/nose ringing	Permitted (though nose ringing not practiced indoors)	Not permitted	Not permitted
Transport to slaughter for cull sows	> 8 hours permitted	Max 8 hours	Slaughter on farm or short distance (<1hr)
Welfare outcome measures	Measurement of body condition, body lesions, lameness and pigs in need of hospital care common	Follow Assurewel protocols which include a wider range of measures including levels of mutilations	Follow Assurewel protocols. Must meet minimum targets for key measures. Standards to increase over time.

8. Finishing Pigs

	Current Minimum Standard	Silver (Minimum acceptable standard)	Gold (World Best practice)
Standards which must be met		RSPCA-Assured or organic. Meets free-range voluntary standard	RSPCA-Assured or organic. Meets free-range voluntary standard.
Breed	Landrace crosses or similar	Landrace crosses or similar	Traditional or slow growing
Bred	Indoors	Outdoors	Outdoors
Weaning age (weeks)	3-4	4	8
Mixing	May be mixed more than once during life	May be mixed once before or after weaning.	May be mixed before weaning when mothers return to family group
Housing	Indoors on slatted floors or concrete without bedding	Outdoors huts on pasture with straw and woodchip for bedding	Outdoors huts on pasture with straw and woodchip for bedding. Provision of wallowing areas and trees and shrubs on range
Tail docking, teeth clipping	Yes	No	No
Stocking density	0.65 m ²	160-170 pigs / hectare according to size (must not exceed nitrogen allowances published by Defra)	160-170 pigs / hectare according to size (must not exceed nitrogen allowances published by Defra)but with additional requirement that there must be vegetation still available over half the area. Rotation is recommended.
Transport	Up to 8 hours	Up to 8 hours	Slaughter on farm or short distance (<1hr)
Slaughter	CO ₂ stunning permitted	CO ₂ stunning not permitted	CO ₂ stunning not permitted
Welfare outcome measures	Measurement of lameness, tail damage, body damage, body condition and use of enrichment common	Follow Assurewel protocols	Follow Assurewel protocols. Must meet minimum targets for key measures. Standards to increase over time.

9. Sheep & Goats

	Current Minimum Standard	Silver (Minimum acceptable standard)	Gold (World Best practice)
Lambing %	~ 200%	100-200%	Max 1% of births triplets or more
Lambing season	Can be all year round	Spring	Spring
Indoor housed	During lambing/winter. Sometimes during finishing. Pasture access otherwise	Sometimes during lambing/winter. Pasture access otherwise.	No. All-year pasture access.
Breed	Traditional	Traditional/robust/easy care	Traditional/robust/easy care; resistant to fly-strike
Castration	Yes	Allowed with pain relief	Not permitted
Tail docking	Yes	Yes – with pain relief.	Not permitted
Transport/Slaughter	Multiple moves during lifetime and possibly long distance to slaughter. Live export may occur.	Multiple moves during lifetime. Shorter distance to slaughter (<8 hours).	No moves during lifetime, slaughter on farm or short distance (<1hr) to slaughter.
Live exports	Permitted for fattening	Not permitted for fattening or slaughter	Not permitted for fattening or slaughter
Religious slaughter	Permitted with or without stunning	Permitted with stunning	Not permitted

Ban slaughter of heavily pregnant farm animals