



Consultation Response

FROM THE RSPCA IN WALES

Peter Fox MS: The Food (Wales) Bill consultation November 2021

RSPCA Cymru welcomes the opportunity to respond to Peter Fox MS' consultation on his proposed Food (Wales) Bill, which gained the Senedd's agreement to be introduced on 17 November.

RSPCA actively encourages people to make higher welfare choices in their consumption of meat, fish, eggs and dairy products. The proposed Food (Wales) Bill provides us with an important opportunity to evaluate how animal-derived products are produced and labelled in Wales and could significantly contribute towards the creation of a more ethical food system in this country; so the progression of this Member-led legislative proposal is very welcome.

80 percent of adults in Wales say the welfare standards of the animals reared is important in their purchasing decisions¹, while 72 percent would pay more for products from animal welfare-friendly production systems². We firmly believe that any food based strategy or legislation should incorporate a focus on higher welfare produce at its heart, to help improve the lives of farm animals while ensuring that ethical consumers have access to the products they seek and that more people are able to opt for higher welfare produce.

RSPCA Assured is the RSPCA's ethical food label dedicated to farm animal welfare - offering consumers assurances about the provenance of their animal products. RSPCA Assured assessors and RSPCA farm livestock officers ensure standards are maintained at farms, during transport and at slaughterhouses, in a model which could be replicated by the Welsh Government when assessing the success of the sector in the delivery of actions aiming to achieve and promote higher welfare.

1, Do you agree with the general aims of the Food (Wales) Bill?

RSPCA Cymru is particularly supportive of the Bill's intention to strengthen statutory requirements on food labeling and hopes that this will include the requirement of 'method of production' labelling for all meat, fish and dairy products and clear labelling of any meat from animals slaughtered without prior stunning. Such labelling would give renewed confidence and assurance to consumers and producers, and potentially revolutionise purchasing decisions in the same way whole egg labelling has done over the last 15 years. Consumers are increasingly interested in the provenance of their food and require such information to inform their purchasing decisions. Many consumers will seek out higher welfare options, while more ethically sourced produce is an increasingly desirable marketing tool for many

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

² European Commission, 2016. Attitudes of Europeans towards animal welfare. Special Eurobarometer 442

companies. Sadly, unclear or absent labels continue to cause confusion and make it difficult for consumers to make adequately informed decisions, or make purchases in line with their intentions. Furthermore, inadequate labelling hinders the sale of higher welfare products and therefore unfairly disadvantages the farmers producing them.

We are also encouraged by the intention of the Bill to strengthen public sector procurement and hope that this will include a focus on the sourcing of higher-welfare products within the sector. Indeed, the Welsh Government must actively encourage the public sector to procure higher welfare products and share good practice as much as possible to promote products that ensure high animal welfare standards. The public sector spends vast sums of taxpayers' money on food every year, with local government food procurement for institutions such as schools coming at a significant expense. RSPCA Cymru has long encouraged the Welsh Government to ensure higher welfare produce is a requirement within its contracts, and to issue guidance to local authorities and other public bodies regarding the sourcing of higher welfare products. The Senedd became the first legislature in the UK to switch solely to RSPCA Assured eggs and salmon in 2010 which was supported by 81% of the staff, civil servants and Senedd Members working within the estate. With this in mind, we call on the Welsh Government to encourage the prioritisation of welfare in all procurement processes relevant to the public sector to help promote higher standards of farm animal welfare, and ensure taxpayers' money is spent more ethically.

This consultation, and the Senedd's deliberations around a potential Food (Wales) Bill, also come as the Welsh Government is progressing its own plans for an Agriculture (Wales) Bill. RSPCA Cymru has identified that legislation as the biggest opportunity in the history of devolution to improve farm animal welfare - by directly incentivising farmers via payments for delivering the highest standards on their farms, as Wales develops a new framework beyond the Common Agricultural Policy's focus on intensive production, and its now out-date focus on radically increasing food production. Clearly, these legislative proposals from Peter Fox MS have the opportunity to complement such changes by providing more information to consumers, and further improving the commercial viability of locally-sourced, higher-welfare produce through enhanced procurement practices and better labelling to consumers.

2. Are there any issues missing from the general aims of the Bill? Would you change anything?

While we agree with the proposed Bill's current focus on sustainability, we call for a focus on a food system that is ethical as well as sustainable. RSPCA Cymru believes the nation's food brand has the potential to become synonymous with the highest welfare standards, as well as high quality and sustainability.

A focus on the ethics involved in the production of food in Wales would provide an important opportunity to consider prohibiting non-stun slaughter in Wales - a practice that does not occur in Wales but is not set in legislation and is something on which RSPCA Cymru has long campaigned. . The law in Wales currently requires animals to be stunned (rendered unconscious) before being slaughtered (neck cutting), but an exemption from this exists for Shechita (Jewish) and Halal (Muslim) slaughter, which means these animals can be slaughtered without being stunned first. Despite this exemption, however, 58 percent of certified UK Halal meat in 2019 came from animals that had been stunned before slaughter³. Scientific evidence demonstrates that farm animals slaughtered without stunning can experience significant pain and distress, and the practice has been labelled 'unacceptable' by the Farm Animal Welfare Committee⁴. Religious beliefs and practices should, of course, be respected and

³ RSPCA Assured, Transportation and slaughter

⁴ RSPCA, Religious slaughter

religious freedom is vital, but RSPCA Cymru believes it is paramount that animals are treated humanely at the time of killing and are therefore stunned prior to being slaughtered. Eighty percent of people in Wales support an end to non-stun slaughter⁵, while a joint petition between the RSPCA and the British Veterinary Association (BVA) in Wales urging action on an outright ban on non-stunned slaughter has attracted thousands of signatures⁶. While it has previously been confirmed by the Welsh Government that no non-stun slaughter is currently being practiced in Wales⁷, a ban would make a clear statement that Wales will not allow the pain and suffering which slaughter without prior stunning causes to farm animals.

In relation to the proposed Bill's focus on sustainability, we call for consideration to be given to how the import of animal-derived products into Wales has the potential to contribute significantly towards our greenhouse gas emissions and ecological footprint. The current negotiation of Free Trade Agreements (FTAs) following our exit from the European Union poses profound challenges for the future of food production in Wales, particularly if an FTA allows the importation of agricultural products reared to standards lower than domestic rules allows or products produced by methods that will increase, rather than mitigate, climate change such as beef produced on deforested land in Australia. Mutual zero tariff market access for agricultural products has been a persistent talking point of FTA negotiation - such as in the deals being struck between the UK and Australia and New Zealand. Not only does importing lower-welfare products from countries such as Australia have implications for animal welfare, but would contribute to our ecological and climate change footprint. Bearing this in mind, RSPCA Cymru believes that incentivising the domestic production of higher-welfare products with a lower carbon-footprint and positive environmental impact could help support the aims of this Bill while concurrently supporting current and future marketing and trade opportunities in Wales.

3. Do you agree with the proposal to require the Welsh Government to introduce a Food Strategy for Wales? How often should the Strategy be reviewed and updated?

4. What should a Food Strategy for Wales include?

Requiring the Welsh Government to introduce a Food Strategy which is reviewed and updated regularly, would provide us with an important opportunity to ensure that animal-derived products are sourced in an ethical manner, and we would encourage animal welfare to be at the heart of any such Strategy. For many consumers higher welfare standards for animals reared, transported and slaughtered for food is an integral, perhaps essential, feature of their interpretation of 'quality'. It is our assertion that principle should therefore be translated into policy and be a consistent theme in any food action plan. Indeed, in its 2010 to 2020 Food Strategy, the Welsh Government acknowledged the importance of helping consumers make informed food choices, and that animal welfare was an area influenced by doing this⁸.

RSPCA Cymru believes that any Food Strategy for Wales should therefore be focused on the ethical production and procurement of animal-derived products. This could include targets and milestones related to higher welfare production in Wales and could also play an important role in encouraging the public to seek out higher welfare alternatives too. For example, the Strategy could include a commitment towards the provision of regular, transparent public awareness campaigns, that encourages consumers to consider how their food has been produced when making informed purchasing choices. As part of this potential Strategy, we call for businesses who choose to use and produce higher welfare products and methods to be recognised and for the Welsh Government to offer support to businesses to ensure they

⁵ RSPCA Cymru, 80% of people support an end to non-stun slaughter in Wales, 2014

⁶ RSPCA Cymru and British Veterinary Association joint petition to end non-stun slaughter in Wales.

⁷<https://gov.wales/sites/default/files/publications/2021-02/slaughter-method-survey-report-2018-for-england-and-wales.pdf>

⁸

are in a position to consider more ethical approaches. This Strategy could also consider how to make higher-welfare products more affordable and accessible to the public, so that less people are forced to opt for lower welfare products because of financial or other constraints.

5. Do you agree with the proposal to establish a Food Commission for Wales?

6. What roles and responsibilities do you think that a Food Commission for Wales should have?

A Food Commission for Wales could play an important role in ensuring the success of an ethical food strategy by liaising with businesses and industry stakeholders and encouraging them to source higher-welfare produce. We would hope any such Commission would seek to ensure expertise from across the broad spectrum of organisations related to food procurement and supply chains in Wales - including the animal welfare sector. The proposed Commission could provide educational sessions, targeted at both businesses and consumers to inform them about the benefits of ethical food production and consumption, with the possibility for this to be extended to schools so that children are given a greater understanding of where meat and animal-derived products come from. The Food Commission could also undertake research to discover how ethical Wales' current food system is and make key recommendations as to how we can move towards a new system that is focused on higher welfare production methods.

7. Do you agree with the proposal for public bodies (such as councils) to develop community food plans?

RSPCA Cymru agrees that community food plans could be used to improve more people's access to, and understanding of, higher welfare products while helping to promote the benefits of making informed, ethical choices. Higher welfare, ethically-focussed procurement practices could be a central focus of a public body's community food plan.

8. How else can we promote the purchasing of locally-produced food by public sector bodies (such as local authorities and schools) and consumers?

RSPCA Cymru would urge the Bill to promote the purchasing of higher welfare products by public sector bodies and consumers, in addition to those that have been locally-sourced. In order to achieve this, we would recommend the provision of relevant public awareness campaigns from Welsh Government, clear and transparent labelling on all animal-derived products and liaison with public sector bodies to encourage them to source more ethical produce, while offering the relevant support needed for public bodies to make this transition.

9. Do you agree with the proposal to require the Welsh Government to report annually on levels of food production in Wales? How best could this be achieved?

If the Welsh Government were required to report annually on levels of food production in Wales, the RSPCA would like to see reporting relevant to higher welfare products included. This type of reporting could include figures related to the number of producers adhering to the highest welfare standards in Wales.

10. Do you agree with the proposal to require supermarkets and other relevant shops to donate unwanted food to charities and food banks? How best could this proposal be achieved?

RSPCA Cymru agrees with the proposal to require supermarkets and other relevant shops to donate unwanted food to charities and food banks and calls for this proposal to be extended to potentially unwanted pet food too. Many animal charities rely on the donation of pet food from the public to provide for the animals in their care and would significantly benefit from the requirement of supermarkets to donate unwanted pet food. This requirement could ensure that animal welfare charities and pet food banks have access to more consistent, high-quality donations which could help alleviate the financial pressures such organisations are under with regards to feeding the animals in their care.

13. Do you agree with the proposal to strengthen and reform food labelling requirements in Wales? If so, how do you believe that food labelling requirements could be changed?

RSPCA Cymru strongly supports the proposal to strengthen and reform food labelling requirements and believes welfare-based labelling should be central to any such requirement. We have seen the impact transparent labelling can have with regards to helping consumers make informed choices through our own scheme - RSPCA Assured, the RSPCA's farm animal welfare assurance scheme. Covering the producer, haulier and abattoir, the scheme is unique in its dedication to animal welfare and has gone from strength to strength since its launch in 1994. RSPCA Assured products are sold in many of the UK's biggest supermarkets such as Tesco, Sainsbury's, Lidl, Aldi and Marks & Spencers, as well as by other major high-street chains such as McDonalds, Wetherspoons and Frankies and Benny's. Consumers can look for the RSPCA Assured logo on produce and have safeguards about the treatment of the animals reared from birth to slaughter. The scheme provides us with an example of how impactful welfare-related labelling can be and we urge for a similar approach to be considered for all animal-derived products sold and produced in Wales; to give consumers more knowledge than ever before about the food they are buying.

14. Do you have a view where the proposals included within the proposed Food (Wales) Bill may have cost or saving impacts? Do you have suggestions how the Bill could be developed to minimise these costs or maximise savings?

A focus on minimising the risks posed by FTA's as outlined in our response to question two, could also help make the domestic agricultural sector more economically viable for current and future generations. As it stands, approximately 53,000 people work within Wales' agricultural sector⁹, making it one of our largest and most important industries. By ensuring that there are less opportunities for lower-welfare produce with a higher carbon footprint to be imported into Wales we can support and protect local jobs, increase the demand for locally-sourced produce with higher welfare standards, minimise import costs and strengthen our local economy.

⁹<https://gov.wales/sites/default/files/statistics-and-research/2020-12/survey-agriculture-and-horticulture-june-2020-932.pdf>