



Consultation Response

FROM THE EXTERNAL AFFAIRS WALES DEPARTMENT

Welsh Government - Delivering Growth: An Action Plan for the Food and Drinks Industry 2014 - 2020

The RSPCA is pleased to be able to provide a response to the Welsh Government consultation document on an action plan for the food and drinks industry in Wales 2014-2020. The RSPCA aims to improve the lives and reduce the suffering of farm animals by aiming to have all UK farmed animals kept to RSPCA higher welfare standards; improving farm animal welfare legislation and ensuring it is enforced; encouraging consumers to choose meat, fish, eggs and dairy products from higher welfare production systems and ensuring animal products are properly labelled so consumers can make higher welfare choices. Indeed 48% of Britons say that animal welfare is either 'extremely' or 'very' important to them when choosing what food to buy¹.

It is the RSPCA's belief that animal welfare principles should be a key aspect of the Welsh Government's Food Action Plan. 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.

Producers, retailers and investors are increasingly aware of higher welfare standards in food and the consumer demand for them. This has been further enabled with the creation of regular reports measuring farm animal welfare management, policy commitment and disclosure in food companies, and is compiled by the Business Benchmark on Farm Animal Welfare (BBFAW)². These reports are "*designed to improve corporate reporting on farm animal welfare management, policies, practices, processes and performance, and, over time, to contribute to improvements in the farm animal welfare practices and performance of food companies*".

Freedom Food

Twenty years ago, the RSPCA, with the creation of Freedom Food, sought to demonstrate that a farm assurance and food labelling scheme could be economically viable in the marketplace and offer consumers a clear opportunity to opt for higher standards. Freedom Food is the only farm assurance scheme to be recognised at both UK and EU levels as a mark of higher animal welfare. The scheme covers birth to slaughter, including standards on the transportation of animals, and was recognised by the Farm Animal Welfare Council³ as a 'higher level' scheme. NSF International⁴ monitor all Freedom Food systems; including assessments, record keeping and certification, and through NSF, Freedom Food is granted accreditation to UKAS standard EN45011.

¹ <http://www.freedomfood.co.uk/aboutus/facts-and-figures>

² <http://www.bbfa.com/>

³ In 2011 the Council was replaced by the Farm Animal Welfare Committee following a review of public bodies

⁴ <http://www.nsf-foodeurope.com/>

There will be a report later this year which will highlight the successes of the scheme plus key statistics in Wales, but for now, we can say Freedom Food has over 3,300 members across farming and food production in the UK and there are RSPCA welfare standards for nine different commonly farmed animals. You can find Freedom Food labelled meat, fish and poultry products in the majority of the UK's supermarkets and in 2013 McDonalds became the first high street chain to switch to serving only Freedom Food pork in all its restaurants. In the UK, 50% of all laying hens are either barn, free-range, or organic, with the majority of these reared under the Freedom Food scheme, and about 28% of UK reared pigs are reared under the Freedom Food scheme – including about three quarters of all outdoor pig production.

The aim of Freedom Food is to change the way of life for as many farm animals as possible, not just those reared for the high-end premium markets. To that end, the RSPCA welfare standards - to which Freedom Food producers have to work - are set at the stretching end of achievable and are regularly reviewed. More information about the history and work of Freedom Food, including a detailed impact report from 2012, can be found at www.freedomfood.co.uk.

CONSULTATION QUESTIONS

Q1 How would you change or add to the mission statement?

As detailed above, the RSPCA believes that the welfare of farm animals should be an integral part of any future food action plan in Wales and as such, we would support the inclusion of higher animal welfare standards within the mission statement.

Q2 Are the overarching themes appropriate? Are there others?

Animal welfare should be at the heart of any food action plan. Should this not be the case, the RSPCA would be concerned that there would be no active encouragement for producers and retailers to strive for higher animal welfare standards and consumer confidence could also be affected.

Surveys undertaken by the RSPCA have shown that the majority of consumers are concerned about farm animal welfare but that knowing what to do, and what choices to make, can be hard. We consider it important, therefore, to work with retailers such as supermarkets, convenience stores and farm shops to increase the visibility of Freedom Food at point of sale and offer reassurance to consumers that they can be confident that the food that they are eating is farmed to high welfare standards. These are principles we would like to see enshrined in the food action plan.

Q3 Do you reject any of the seven priorities? What else would you suggest? How would you rank the priorities in order of importance?

The priorities of the RSPCA would be food assurance and traceability, along with market development. The RSPCA believes that it would be beneficial for the food industry in Wales, if Welsh food labels were synonymous with a higher level of animal welfare. As mentioned above, a significant majority of consumers are concerned about farm animal welfare.

The RSPCA also believes it is important to educate the market about higher welfare to create behaviour change without the need for legislation. A prime example of this in recent years has been consumer awareness of the welfare of laying hens. This has been one of the key success stories which resulted in the number of laying hens reared under Freedom Food, between 2006 and 2011, increase by 53% from 11.6 million to 17.8 million.

We would also be keen to see the welfare of animals in transit given significant prominence within the

priority list, namely under food assurance and traceability. The RSPCA wants to see an end to long-distance transport of live animals in favour of a 'carcass-only' trade. In our view, this ensures the welfare of the animals reared for food, but it also protects the slaughterhouses and associated businesses operating within Wales. Keeping business local and Welsh, however, must also be synonymous with higher welfare and, as such, we will continue to campaign for legislation to ensure welfare at slaughter, such as no exemptions for animals not pre-stunned and CCTV in all abattoirs.

Q4 What should be the role and responsibilities of the Welsh Food and Drink Federation?

The Welsh Food and Drink Federation must be a vehicle to support the industry in Wales and encourage higher welfare standards for farm animals. The RSPCA would call on the Federation to work with the soon to be appointed steering group of the Animal Health and Welfare Strategy in Wales to ensure both bodies learn from each other and share good practice. The RSPCA would like to see formal structure for the interaction between these two important bodies.

The RSPCA and Freedom Food would also be willing to partner with the Federation. We work with food brands, chefs, restaurant owners and food service companies to encourage them to buy from Freedom Food suppliers or to help them bring their suppliers up to Freedom Food approved status, in order to make it easier for consumers to choose the higher welfare option.

Q5 What should be the membership make up of the Welsh Food and Drink Federation?

The RSPCA welcomes the creation of this new body that should provide direction, monitoring and challenge, on an on-going basis, in relation to the delivery of the Action Plan for the Welsh Food and Drink Industry. We believe that representatives from the whole of the supply chain need to partner with Welsh Government in the Food and Drink Federation.

The RSPCA would welcome the opportunity to partner with the Welsh Food and Drink Federation to highlight the benefits to producers of adopting higher welfare standards. As Freedom Food is the only farm assurance scheme to be recognised at both UK and EU levels as a mark of higher animal welfare, we have expertise on a UK level that could be utilised. Indeed, Scottish Environment Minister, Paul Wheelhouse, commented: *"More than 60% of Scottish farmed salmon now has the RSPCA's Freedom Food accreditation, which is a great endorsement and selling point"*. Such benefits for Welsh producers of other species at higher welfare standards, should be explored.

Q6 How should the Food and Drink Wales identity be developed to be most advantageous to food businesses and market development?

Following recent food scandals, consumers are anxious to know where their produce originated. Freedom Food labelled products are fully traceable from the shop shelf back to the individual farm. Not only are details checked when a product is labelled, Freedom Food also employ independent auditors to randomly select and check the supply chains of producers to ensure complete confidence that a product carrying our logo has come from animals reared at each stage of their life to RSPCA welfare standards. Applying these principles more widely in Wales, could better reflect consumer demands; boost growth in the market; and strengthen the Programme for Government commitment of increasing the value of Welsh produce.

Q11 What targets do you think would be appropriate for the food and drink industry and how should they be measured?

The RSPCA would be happy to discuss targets around higher welfare standards.

Q12 What actions would you suggest to grow the food industry in Wales and develop new markets?

As previously outlined in detail, the RSPCA believes that consumer demand is growing for traceable, higher welfare and clearly labelled foods, including the method of slaughter. It is our belief that this is the major growth area that any Welsh food label must be cognisant of and include at its core. With consumer confidence installed, it would then be possible to market such foods internationally.

Q13 What are the most important actions to grow trade?

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.

Q14 What other approaches / actions could enhance Wales' reputation for quality food / as a quality food destination?

As mentioned at the beginning, it is important to be aware of the consumer's understanding and inherent meaning of 'quality'. If research in Wales supports our assertion that the consumer attaches higher welfare standards to the definition of 'quality', then it lends further weight to our call for such principles to be enshrined in the action plan. Such standards could then enhance Wales' reputation and allow food producers and retailers to flourish.

Q15 What partners (organisations and key influencers) would you suggest to enhance and add value to our quality food culture in Wales?

The RSPCA would be willing to work alongside the Welsh Food and Drink Federation to identify key partners and organisations within Wales and on a UK/European level that could add value and share examples of good practice at home and abroad.