



Consultation Response

FROM THE RSPCA IN WALES

RSPCA Cymru consultation response: Sustainable Farming and our Land October 2019

RSPCA Cymru welcomes the opportunity to respond to this critical consultation - which comes at a hugely important juncture for the future of farm animals in Wales, as the country prepares to leave the European Union. Since the result in June 2016 the RSPCA has worked tirelessly to ensure the risks for animals associated with withdrawal are mitigated, and the opportunities for improving animal welfare standards are seized.

The legacy of the Common Agricultural Policy, first implemented under the Treaty of Rome in the early 1960s, was to increase food production, in a way which intensified farming, with the result being contrary to good animal welfare standards. The philosophy and wider circumstances, however, underpinning any new system in 2019, would be very different - with increased public expectations and understanding of higher welfare, and advanced animal welfare science. Sadly, current incentives promote intensive housing systems, management practices and breeding practices that prioritise productivity, often to the detriment of welfare considerations - and the Welsh Government's current consultation on a new approach offers a unique opportunity to introduce a seismic shift in approach.

What are your views on the sustainable land management framework? What are your views on the proposed sustainable farming scheme?

RSPCA Cymru believes that the sustainable land management framework and associated sustainable farming scheme could be improved by placing more focus on the role the sector can play in driving animal welfare standards forward within Wales. Importantly, the Welsh Government's planned emphasis on rewarding farmers for delivering wider public, environmental and social benefits offers huge potential in this area; yet the proposed approach could include much more than the minimal reference currently made to the role welfare can play as part of the proposed payment process.

While delivering public goods such as enhanced air quality or management of certain habitats will deliver some benefits to the welfare of farm animals, the absence of a far greater focus on equating higher farm welfare standards with financial reward potentially misses a huge opportunity to substantially improve standards within Wales. The RSPCA believes animal welfare rewards would be complementary with these other public good payments.

The RSPCA warmly welcomes the reference within the consultation to a need to 'incorporate animal health and welfare improvements' into Farm Sustainability Plans; however little information is currently provided within the proposals as to the level of prioritisation this would be given; or how payments could

be directly linked to improved welfare standards. RSPCA Cymru would welcome additional assurances from the Welsh Government that welfare will be at the heart of these new proposals; given the impact this could have on millions of animals. There is a clear desire from consumers for improvements in farm animal welfare - and such action from the Welsh Government in developing these proposals would assist in meeting these public expectations; encouraging producers to invest to improve the welfare of their animals.

The scale of farm animals living in Wales is vast - and, as such, action in this area has the chance to dramatically improve the lives of some 9,500,000 sheep, 166,600 beef breeding herds, 254,300 dairy breeding herds and 23,200 pigs in Wales. Given the Welsh Government's commitment to healthy livestock being kept to high standards of welfare, the implementation of this scheme offers a significant opportunity to reward and incentivise such practices with direct financial contributions.

As such, while the sustainable land management framework places strong emphasis on the range of economic, environmental and social benefits farms can deliver for Wales, we would urge the Welsh Government to revisit these proposals and ensure animal welfare is given greater credence and clarity. By setting clear welfare benchmarks via the proposed Farm Sustainability Plans, and with the support of Advisers, there is scope to not only ensure increased promotion of the Welsh Government's code of practice for species such as cattle and chickens, but to ensure standards exceed this and 'Brand Wales' becomes increasingly synonymous and associated with higher welfare. Indeed, on other topics, the Welsh Government is clear that delivery should exceed the requirements of regulation - known as 'additionality'. We would, thus, urge the Welsh Government to at least explore incorporation of welfare in the 'option' element of Farm Sustainability Plans by which farmers can access financial assistance. This could also contribute to another key aim of the consultation - the upskilling of producers and others working within the livestock sector.

Public opinion suggests strong support for Welsh Government action in this area. Polling for RSPCA Cymru found that 80 per cent¹ of adults in Wales say that the welfare standards of the animals reared is important in their purchasing decisions. Additionally, Eurobarometer surveys highlight that 62 per cent² of the British public do not feel animal welfare receives adequate importance in UK food policy; while 72 per cent³ would pay more for products from animal welfare-friendly production systems. Perhaps most pertinently, polling has found 82 per cent⁴ support farmers receiving subsidies to support animal welfare.

Rewards and incentives utilising public money to drive up farm animal welfare standards should be for farmers and producers exceeding current industry standards and practices. Equally, payments should not be incentivising production; thus ensuring any new scheme is compliant with World Trade Organisation (WTO) rules.

Success of the payment scheme could be assessed by considering the proportion of animals being produced according to higher welfare standards, or within a formally-recognised, higher welfare farm assurance scheme. Equally, the frequency of key species-specific animal welfare problems, such as lameness in cattle, tail damage in pigs and feather cover in laying hens, could be used.

¹ YouGov Plc. Total sample size was 1,001 Welsh adults (aged 18+). Fieldwork was undertaken between 4th - 8th 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, 2005. Eurobarometer – Attitudes of consumers towards the welfare of farmed animals Q12.

³ European Commission, 2016. Attitudes of Europeans towards animal welfare. Special Eurobarometer 442.

⁴ RSPCA Report - [Into the fold: Targeted financial support to improve farm animal welfare](#)

Recognition of welfare via the Sustainable Farming Scheme could be done on a two-tiered approach; with financial incentives given to members of a formally-recognised higher welfare farm assurance scheme, such as those delivering the RSPCA's scientifically-backed higher welfare standards, or equivalent. This could be underpinned by 'transitional payments', whereby producers are financially incentivised for taking steps helping them on a journey to reach the eligibility for a higher welfare farm assurance scheme; for example one-off capital costs to cover buildings or training costs to improve stockmanship. This would be in line with previous support via schemes for capital expenditure.

What are your views on an advisory service?

It is very welcome that the Welsh Government proposes to make available to all farmers an advisory service which aids their transition from operating within the European Union to outside of it.

The proposed advisory service offers a unique opportunity for the Welsh Government to discuss with farmers the steps they can take to drive up animal welfare standards across Wales; and incorporate higher standards into the proposed Farm Sustainability Plans, by which farmers would access the Sustainable Farming Payment and other support. By working with farmers individually, there is clear scope to tailor this support to individual farms and the particular circumstances, species and conditions they face in driving up standards of animal welfare.

Unfortunately, the consultation includes little information about who these advisers would be, or what their background would be. We would welcome these individuals to have undergone thorough training of - and understand - higher standards of farm animal welfare; and to incorporate into Sustainability Plans tangible steps that farmers can take to ensure these standards are met.

What are your views on providing support to the industry and supply chain?

Higher welfare standards offer huge promotional value in farmers' produce. As such, support from the Welsh Government for the wider agricultural sector, including the whole supply chain, should acknowledge the role of higher welfare produce as a priority area of focus.

It is the RSPCA's belief that this provides clear potential for ensuring 'Brand Wales' is associated, and globally recognised alongside, higher welfare outcomes - and could provide farmers delivering higher welfare with seamless access to the growing food sector in Wales, and the supply chain. In this vein, 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.

We note respondents to the Welsh Government's previous consultation - *Brexit and our Land* - proposed support for local abattoirs. We would urge such support to be in line with the promotion of good welfare practice, such as the inclusion of closed-circuit television for monitoring, and humane slaughter practices. Such an approach would be consistent with previous support offered by the Welsh Government to small abattoirs via Food Business Investment Grant Aid.

What are your views on our proposals to improve the current regulatory system and develop a new regulatory framework?

The Welsh Government highlights the importance of a clear, enforceable regulatory baseline - and that

exceeding that baseline for outcomes not otherwise rewarded by the market would be met with financial incentives.

RSPCA Cymru would welcome any moves which make the promotion of higher animal welfare standards and the benefits of exceeding minimum requirements more accessible to farmers. We would also welcome further information from the Welsh Government as to the impact it anticipates a new regulatory framework will have on farm animal welfare law, inspections and processes; and whether this will lead to any consolidation or simplification of the existing framework.

We support ensuring the regulatory framework is accessible for farmers; and places all farmers and land managers on a level regulatory playing field. The Welsh Government's proposals for Sustainable Farm Payments offers opportunities to clearly distinguish between minimum legal standards, and what is good practice exceeding these regulatory minimums.

Inspections are so important for ensuring legal compliance at farms; and play an important role in meeting public expectations. RSPCA Cymru believes taxpayers will want to ensure that poor animal welfare practices are not being subsidised via the new scheme, and instead standards are both checked and appropriately incentivised.

The Welsh Government's acknowledgement of voluntary farm assurance schemes are wholly welcome. These schemes are not only more likely to ensure compliance with legal requirements, but can also ensure these requirements are exceeded, including with regards to animal welfare where assurance schemes include higher welfare standards. Compliance with these schemes can pave the way for more risk-based targeting and earned recognition in terms of inspection scheduling and frequency.

What are your views on the purpose and design of a transition period?

The uncertainty around the total available budget for future agricultural support in Wales clearly makes responding to this element of the consultation more difficult. Greater clarity in this area would ensure a better discussion about the levels of support that can be offered and thus the potential scale of support which could be delivered in parallel to improve farm animal welfare. The Welsh Government makes reference to future decisions needing to be made to decide the new allocation of funding for the proposed Sustainable Farming Scheme, support for wider industry and for incorporating elements of the Rural Development Programme into the new arrangements. The RDP has previously outlined animal welfare in the food chain organisation, and we would welcome assurances this will remain in place and that no support in this area will be lost.

We note the Welsh Government's continued commitment to an Agriculture (Wales) Bill in the coming years. While provisions within the UK Agriculture Bill will ensure the Welsh Government can act now amid ongoing Brexit-based uncertainty, RSPCA Cymru looks forward to the introduction of a bespoke Wales-only Bill, subject to Welsh Parliamentary scrutiny. In addition to the legislative basis for the new farm support scheme, we would welcome discussions and dialogue as to other aspects of farm animal welfare policy which could be incorporated into this new primary legislation.

We have previously voiced support for Welsh Government plans to phase in new programmes so they are fully implemented by 2025. While uncertainty around Wales' withdrawal from the European Union prolongs, RSPCA Cymru does believe such an approach could provide the time to trial funding streams, assess outcomes and give farmers the time to change from the BPS to the new scheme.

What are your views on the analytical approach set out?

RSPCA Cymru will continue to call for animal welfare to be more clearly recognised via the Sustainable Farming Scheme as a positive environmental outcome for which farmers and the agricultural community should be recognised and financially rewarded. Modelling should consider the impact this could have on a large quantity of animals, and prioritise recognition particularly where the welfare action being taken may not have clear or direct market benefits. With proposals due to be discussed in a co-design programme in the autumn, we would also urge the Welsh Government to ensure the animal welfare sector is adequately consulted and involved in this process to further explore proposals.

[If you have any related issues that we have not specifically addressed, please let us know.](#)

Representations were made at a recent Welsh Government roundtable on the Code of Best Practice on the Use of Snares in Fox Control, concerning whether farmers could be rewarded as part of any new scheme for ensuring only code-compliant snares are used on their land, or moving away from the use of snares as a tool of wildlife management completely. We would welcome further discussions on this and related topics to ensure opportunities to deliver the Welsh Government's wider animal welfare agenda and priorities are potentially delivered as part of the proposed farm support package. Ultimately, RSPCA Cymru regards this process as a unique opportunity to engage with the whole agricultural community and utilise financial incentives and levers to improve farm animal welfare outcomes.

We would encourage the Welsh Government to utilise this opportunity to deliver complimentary animal welfare policy decisions. For example, mandatory method of production labelling could ensure the successful implementation of any new support scheme prioritising farm animal welfare practices. This would help consumers make an informed choice, and understand welfare issues at a market level. Labelling would also bring other farm animal production into line with egg production - and work in tandem with incentivisation for higher welfare practices; both meeting public expectations in this area and implementing a legal basis by which consumers can make informed choices.

Indeed, the RSPCA believes that this process provides an opportunity to implement measurable action that tangibly improves farm animal welfare. By operating to higher welfare standards, we can ensure the creation of a more resilient livestock sector which is intrinsically aligned with the values of the public in Wales, and the wider policy objectives of the Welsh Government. Action could also boost the productivity and profitability of the livestock industry in Wales; with the elimination of poorer welfare and endemic disease likely to save tens of millions of pounds annually.