



Consultation response

Sustainable Farming Scheme - Keeping farmers farming

RSPCA Cymru welcomes this latest opportunity to input into the Welsh Government's [proposals](#) for providing financial support to the farming and agricultural industry, following the adoption of the Agriculture (Wales) Act 2023. A new system of agricultural support in Wales is regarded as a significant opportunity to maintain and enhance welfare standards; which could transform the lives of millions of farm animals in Wales. With approximately 9,500,000 sheep, 166,600 beef breeding herds, 254,300 dairy breeding herds and 23,200 pigs in Wales¹ the policy provides an important and much-needed opportunity to improve animal welfare standards under the Welsh Government; arguably the biggest in scale since the onset of devolution.

Key policy recommendations:

- ❖ Include Universal Actions 15-17 on animal health, welfare and farm biosecurity within the future Sustainable Farming Scheme (SFS)
- ❖ Consider whether the Optional Action relevant to animal welfare and farm assurance schemes could become Universal/mandatory
- ❖ Encourage and incentivise farmers to participate in species and habitat restoration programmes by providing them with the relevant financial support

Q1. The Scheme will provide a long-term approach to support for our agricultural sector to respond to evolving challenges and changing needs, contributing to the Sustainable Land Management objectives. In your view, what may strengthen this support?

Universal Actions

In general, we welcome the three Universal Actions relevant to animal welfare that are proposed under the Sustainable Farming Scheme (SFS): UA15 on animal health, UA16 on animal welfare and UA17 on biosecurity.

Being a member of a farm assurance scheme delivering to the RSPCA's welfare standards, or equivalent, is proposed as an Optional Action within this consultation. However, the RSPCA believes this could offer the Welsh Government clear assurances that farm animals are being looked after to high standards for the whole of their lives. We would therefore support this particular action being made mandatory/Universal as opposed to Optional. Such schemes could apply validated welfare outcome assessments to farm animals, and apply a proposed Good Scheme Framework² to deliver continuous welfare improvements over time. This would ensure that both Welsh farms, and - by extension - Welsh produce is being reared and slaughtered to the very highest standard; and that farmers are being incentivised to deliver such standards. We would therefore support stronger proposals to reward farmers for being members of such schemes. This would also provide evidence of an Animal Health Action Plan that is rewarded under

¹ Welsh Government, [Farming Facts & Figures](#) 2018 [Accessed February 2024]

² D C J Main, S Mullan, C Atkinson, M Cooper, J H M Wrathall and H J Blokhuis, 2014. Best practice framework for animal welfare certification schemes. *Trends in Food Science & Technology* 37, 127–136

UA15. For instance, the RSPCA welfare standards already mandate the use of an animal/veterinary health and welfare plan on farms and include detailed requirements relating to this, such as the development of prevention and action plans to address key farm specific issues. Furthermore, for many of the most commonly farmed species - dairy cattle, beef cattle, sheep, meat chickens, laying hens and pigs - the RSPCA welfare standards require the assessment of welfare outcomes on farms. This includes a set list of health and welfare parameters, such as lameness and body condition score, which are recorded during the RSPCA Assured assessment. The effectiveness of this approach in improving health and welfare is demonstrated by the significant reduction in feather pecking among RSPCA Assured laying hens farmed in the years following its introduction³.

It is noted under UA15 that farmers will be required to calculate and submit annual antibiotic usage per species as part of the benchmarking process. While the RSPCA supports this, we recommend that more guidance is provided as to the most appropriate metric to use to ensure that submitted data accurately reflects use. We would therefore suggest the recording method be aligned with the recommendations of the Responsible Use of Medicines in Agriculture Alliance (RUMA).

In principle, we welcome UA16 on animal welfare to provide training, competency and understanding on body condition scoring (BCS) and lameness, including record keeping, to improve the health and welfare of animals. In particular, this could be used as a springboard to create a readily available, validated lameness score for sheep which, unlike for cattle, is currently lacking. However, the scope of this proposal seems rather limited, being only relevant to certain species such as cattle and sheep. It is not known whether this is the intention or whether it could also be applicable to other species, such as meat chickens and breeding pigs who are also prone to lameness. A broader action relating to training and competency that would be relevant to all livestock sectors, including poultry, would have a greater impact. Support and encouragement for the review and development of agriculture college courses and/or training programmes to reflect cutting edge 'best practice' and the use of technology that enhances farm animal welfare would also be helpful.

While it is appreciated that this consultation provides outline proposals and that more detail will follow, further consideration is needed as to what methodologies will be acceptable, especially for lameness, with this being included in UA1 (Benchmarking Action). For lameness, consideration is needed as to what metric is recorded (incidence vs prevalence). This would ensure that farmers who proactively monitor foot health, with high apparent lesion incidence, would also be recognised for low prevalence. Clarification will be needed as to how cases will be recorded and what constitutes a latency between bouts of lameness, and when a case should be recorded as one bout or separate bouts. BCS for sheep should include elements of palpation, as well as visual assessment.

The RSPCA welcomes the inclusion of UA17 as reducing the introduction of disease on farms and the spread of disease between farms will help to protect animal health and improve welfare. It is understood that support will be given to farmers to identify risks and "*...take a proactive approach to disease prevention and control...*". However, it is not clear how a consistent approach in terms of advice will be achieved and whether materials will be created to support this action beyond the list of biosecurity measures that must be in place. While the list of outlined mandatory actions is welcome, there are additional measures which are not overly onerous and have minimal cost that we would also recommend including. These include:

- Establishing and maintaining a record of all visitors to the farm, including information as to any recent contact elsewhere with the species on site
- Including mucking and slurry disposal plans in the biosecurity assessment, where appropriate
- Including procedures for wild animal control in written policies

³ SM Mullan, C Szmaragd, MD Cooper, JHM Wrathall, J Jamieson, A Bond, C Atkinson and DCJ Main, 2016. Animal welfare initiatives improve feather cover of cage-free laying hens in the UK. *Animal Welfare* 25: 243-253.

- Incorporating the related Optional Actions related to biosecurity as they would help to significantly reduce the risk of disease incursion and spread. For clarity, these are:
 - Establish a three-metre wide fence and hedge along the farm boundary (where appropriate) to prevent neighbouring stock coming into contact
 - Secure stores for deadstock, at the farm boundary to minimise entry of fallen stock vehicles to the farm premises
 - Secure feed stores to keep out wildlife and vermin and other sources of potential indirect contamination such as bird droppings, or transfer from vehicles or personnel
 - Installation of water point and concrete pad at entry/exit points with effective drainage away from livestock areas
 - Signage around the property to direct vehicle and personnel flow such that movement is not from higher to lower risk areas without adequate cleaning and disinfection
 - Support for building of Isolation Units (which must be kept clear/available for use)

Optional Actions

While the Universal Actions highlighted above would help to improve health and welfare for the species affected, the RSPCA is disappointed that there are few additional/optional standards relevant to animal welfare. At present, these are limited to one Optional Action which proposes payments to support the use of a higher animal welfare standard, including adopting the Good Life Approach or a similar initiative. Positively, support from farmers in terms of being incentivised to adopt such approaches is high, with almost 70 per cent of respondents either interested in doing so (51 per cent) or already doing so according (18 per cent) according to a recent Welsh Government survey⁴.

Ideally, payments would be awarded to farmers that are members of a formally recognised higher welfare farm assurance scheme. These include schemes that deliver the RSPCA's higher welfare standards or equivalent, cover the whole life of the animal from birth/hatching to slaughter, apply validated welfare outcome assessments, and apply the Good Scheme Framework to deliver continuous welfare improvement over time. We would therefore support such action being made Universal as opposed to Optional.

Other recommendations of what mandatory schemes relevant to animal welfare could entail include:

Laying hens: Outcome funding for rearing birds with intact beaks and good feather cover

Payments should be made to farmers who are members of a higher welfare scheme for achieving the outcome of hens with intact beaks and good feather cover at the end of the laying period.

Laying hens: Capital investment in pullet rearing and laying hen systems

Incentivising farmers with grant funding to contribute to the cost of upgrading systems and including higher welfare housing aspects such as verandas or automated monitoring systems. Payments should be made to reflect the potential improvements the upgrades would have on welfare. For example, a veranda provides birds with a sheltered area outside of the house and therefore reduces the house stocking density.

Meat chickens: Outcome funding for using slower growing, higher welfare breeds

Payments should be made to farmers to compensate them for any additional costs of using slower growing, higher welfare breeds as accepted under the RSPCA Welfare Standards for Meat Chickens. Payments should be based on the number of birds that are a higher welfare breed.

Meat chickens: Outcome funding for reduced stocking densities

Payments should be made to compensate farmers for the cost of reducing stocking densities to 30kg/m² or less.

⁴ <https://www.gov.wales/sites/default/files/publications/2023-07/sustainable-farming-scheme-co-design-final-report.pdf> [Accessed February 2024]

Breeding pigs: Capital investment in free farrowing systems

Farmers should be incentivised with grant funding for the capital cost of changing from a crate-based system to indoor/outdoor completely free farrowing systems. Payments should be based on the number of sow places and verified by invoices showing the costs of conversion.

Finishing pigs: Outcome payments for intact tails

Farmers should be incentivised to take a range of measures to produce pigs with intact tails (no tail docking and tail biting). Farmers should be paid an agreed amount per pig - for example, the grants made in Lower Saxony are €16.50 per intact tail. To receive these payments farmers should be members of a higher welfare scheme.

Sheep: Outcome payments for intact tails and no castration

Farmers should be incentivised to take a range of measures to reduce or eliminate routine tail docking and castration in sheep; such as encouraging herd management, breeding for reduced fly-strike risk and crutching.

Dairy cattle: Capital investment for farm-specific transition plans

Grant funding for farm specific investments including costs for access to pasture (when conditions permit) and associated improvements to cubicles that would enable the farm to be compliant with higher welfare standards.

Beef cattle: Capital investment funding for housing upgrades/improvements

Grant funding for specific investments in housing that improve welfare. For example, the conversion of slatted floor sheds to straw yards, to allow for reduced stocking densities.

While there are currently proposals for the delivery of an Optional Action that supports the use of a higher animal welfare standard, the RSPCA believes that including these under a Universal Action would have a significant and positive impact on animal health and welfare. Approaches that deliver higher welfare using financial rewards as incentivisation have a precedent in terms of their success. Evidence from the University of Bristol's Healthy Feet Project demonstrates that lameness in cattle improved when monitoring welfare outcomes on farms is provided with additional support to the farmer, when compared to monitoring welfare without any additional support, such as via the discussion of results and advice⁵. Outcomes improve further when welfare monitoring and additional support is combined with financial incentives to improve welfare⁶.

Q2. There will be Universal requirements in the SFS to have woodland cover at least 10% of suitable land, and to manage a minimum of 10% of your farm as habitat.

a) What are your views on these requirements?

With the RSPCA being a key stakeholder in the welfare of wild animals, we have long held concerns around the destruction of natural habitats where wildlife can be found and the impact this has on the species affected. We therefore support initiatives that encourage farmers to take responsible approaches to the way they manage their land to mitigate the potential impacts on wild animal welfare. We also support the development of environmental initiatives that promote habitat and species conservation and restoration, such as those listed in this consultation's proposals.

Farmers should be encouraged to participate in species and habitat recovery programmes and those that do should be rewarded through financial support - especially if by engaging in such projects, their

⁵ Main, D.C.J. et al., (2012) Evaluating an intervention to reduce lameness in dairy cattle, *Journal of Dairy Science*, 95 (6) pp. 2946 - 2954

⁶ Whay, H. & D. C. J. Main (2010) *Improving Animal Welfare: Practical Approaches for Achieving Change*. Grandin, T. (ed) *Improving Animal Welfare*, 1st ed. Cambridge University Press: Cambridge.

businesses are penalised in some way. It is likely that such support would also encourage wider participation in such schemes.

b) What support might you need to achieve them?

While the proposal includes some guidance as to how the 10% requirement will be calculated, further information and clarification would be beneficial. For example, it is stated that tree canopy can contribute to the 10% tree cover requirement. However, there is no confirmation as to whether this includes both deciduous and coniferous trees, given that deciduous trees do not provide full cover throughout the year. For immature/newly planted trees, clarification is needed as to whether the area that the vegetation is expected to cover when mature will be taken into account when calculating compliance. We would also question whether natural cover on the range of free-range poultry farms will be accepted in the calculations.

Q4. On-farm data reporting allows the Welsh Government to confirm actions are being undertaken and help you to make decisions about your farm. In your view, is the reporting requirement for the Universal Actions appropriate?

For UA15, the annual submission of antibiotic usage per species seems appropriate. However, as stated in our response to Q1, the RSPCA recommends that more guidance is provided regarding the most appropriate metric to use to ensure that submitted data accurately reflects use. We would suggest that the recording method is aligned with the recommendations of the RUMA. With regards to the Animal Health and Improvement Cycle (AHIC), it states that farmers “...will not need to routinely submit the completed AHIC template as [they] will confirm completion of the four steps of the AHIC by self-declaration.” The use of the word ‘routinely’ here creates ambiguity and it is not clear whether the completed AHIC template will ever need to be submitted and if so, under what circumstances. The RSPCA would recommend a requirement for the submission of the initial AHIC template in order to ensure consistency and sufficient detail. This would also help the Welsh Government to establish the key health and welfare parameters affecting livestock in Wales by species. Such information would be useful for future decision making in relation to the allocation of resources, including training and funding. It would also help to ensure that the list of Key Performance Indicators (KPIs) related to health and welfare that are required to be recorded and submitted under UA1 are reflective of the most widespread issues seen on farms.

In relation to the Universal Action on *Good animal welfare* (UA16), the RSPCA supports the requirement for annual recording of the number of lame animals in the herd or flock, as part of the Benchmarking Action (UA1). Given that lameness is widely regarded as one of the most pressing welfare issues affecting dairy cows in particular, it is imperative that accurate recording and monitoring of prevalence levels at a national level is undertaken. This in turn will help gauge the success of intervention measures employed on farms.

Q8. To ensure continued high standards on our farms, we have outlined a proportionate approach to controls and sanctions, including compliance with additional legislation as a condition of Scheme payment. Do you have any views on this approach?

The RSPCA agrees that a system of enforcement, such as cross-compliance, is required in the new farm support system. However, cross-compliance under the previous payment scheme was used as a blunt instrument for enforcing payments - a more flexible system encouraging compliance for minor offences may therefore be needed. The RSPCA agrees that anyone who is not compliant with additional legislation should not be able to claim any Universal or Optional payments under the SFS or Basic Payments Scheme (BPS).

Q12. What actions and support within the Optional and Collaborative layers do you believe should be prioritised?

The RSPCA believes that the Optional Action relevant to improving animal health over and above the Good Animal Welfare (UA16) and Good Farm Biosecurity (UA17) Universal Actions should be prioritised. That said, as already identified, we believe that those related to biosecurity could be incorporated into UA17 (see response to Q1 above).

If 'Support to use a higher animal welfare standard... adopting the Good Life Welfare approach (or a similar initiative)' were to be retained as an Optional Action, rather than a Universal Action, we believe this should be prioritised for support. We would recommend that payments are awarded to farmers that are members of formally recognised higher welfare farm schemes that cover the whole life of the animal from birth/hatching to slaughter, apply validated welfare outcome assessment, and apply the Good Scheme Framework to deliver continuous welfare improvement over time.

Q16. We would like to know your views on which information and evidence should be used to monitor and evaluate the Scheme.

The RSPCA believes that future policies aimed at farm animal welfare such as the SFS should also ensure:

- A transparent and clear process for obtaining payments
- Forms that are easy to understand and fill in
- Grants that provide ongoing support to be open, if required, for the entire five year programme period to provide continuity and certainty
- A checking system that applies to all applications and a risk based approach to monitoring to ensure compliance
- Clear targets that can be audited at the mid-term and end of the programme. Any grants should be assessed to ensure they do not negatively impact on animal welfare standards
- For any grant for ongoing costs to be based on income foregone