



FAWC, Area 5a, 9 Millbank, c/o Nobel House
17 Smith Square, London, SW1P 3JR
Tel: 020 7238 5016 Fax: 020 7238 3169

Stephen Steele
CAP Reform and EU Strategy
5D Millbank
C/O 17 Smith Square
London
SW1P 3JR

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Dear Stephen

FAWC Response to the Defra Consultation on Proposals for the 'Health Check' of the EU Common Agricultural Policy

FAWC welcomes the opportunity to comment upon the proposed 'Health Check' review of the Common Agricultural Policy and its potential impacts on the UK. While recognising that this 'review' is essentially designed to adjust, improve and reinforce the more substantive CAP reforms of 2003 in response to present market opportunities and new challenges, FAWC is nonetheless concerned that farm animal welfare is largely absent as a specific consideration in the current review proposals. FAWC is also concerned that a number of the projected impacts of the adjustments proposed in the 'Health Check' review have potentially negative welfare implications for certain farm systems and is therefore keen to see that mechanisms will exist to respond to such implications.

The 2006 Working Document of the European Commission on a Community Action Plan on the Protection and Welfare of Animals 2006-2010 (COM(2006) 14 final), identifies farm animal welfare as occupying a "central place within the Common Agricultural Policy" (para 1.3). Furthermore, recent research, both at a European level and within individual Member States has demonstrated high levels of consumer concern over issues of farm animal welfare which, in Britain, have been reinforced by recent media interest. The Health Check review, however, makes few direct references to the improvement of farm animal welfare. Animal welfare is not identified as a 'New Challenge' and no changes are currently being proposed to the statutory management requirements relating to animal welfare within cross compliance rules. At a time when farm animal welfare is high on the agenda of not only consumers but also retailers and producer interests, keen to seek market advantage from the voluntary adoption of higher welfare standards, FAWC hopes that in its own response to the 'Health Check' review, DEFRA is attentive to the possibilities it offers for improving levels of farm animal welfare in Britain. Under Section 2.3 (page 5) of DEFRA's document '*Impact of the "Health Check" of the Common Agricultural Policy*' FAWC would like to see the inclusion of 'animal welfare' in the stated ambition ii.

With respect to the more specific proposals of the Health Check review, FAWC offers the following views.

The proposal to increase milk quotas by 1% annually from 2009 to 2013 is intended to mitigate the impacts of a more sudden removal of all quotas in 2015. While this is welcomed, the acknowledged impact of the proposal is likely to be a growth in the size of the UK dairy herd (arguably prompted further by falling milk prices), leading most probably to an increase in animal stocking densities and degrees of intensification amongst the more profitable sectors of the industry. FAWC is concerned that such an increase could impact negatively upon the welfare of dairy cattle, particularly at a time when broader awareness of welfare issues, such as lameness, in dairy cattle is increasing.

According to DEFRA's impact study, the impact of the proposed stepped decoupling of beef payments under the reforms of the Single Farm Payment is likely to be negligible. However, this may vary across different production systems. Extensive livestock systems, where certain welfare standards might be more easily achieved and where the possibilities for market advantage through welfare-friendly marketing strategies are likely to be more developed, will see a fall in subsidies resulting from the decoupling of the beef special premium and the slaughter premium. FAWC would like to see consideration being given to the appropriate use of Pillar 2 funds to encourage those livestock systems that deliver high levels of animal welfare as well as environmental goods and rural development objectives. This should extend across livestock production systems.

DEFRA's response to the Health Check proposals make no mention of the possibility of using Article 40 of the Rural Development Regulation 1698/2005 to make animal welfare payments to farmers making a voluntary contribution to improved animal welfare over and above mandatory standards (as for example, the Irish *Animal Welfare Recording and Breeding Scheme for Suckler Herds*). As in our consultation response of the 22nd May 2005 to the DEFRA Consultation of the Rural Development Regulation proposals, FAWC reiterates its support for such an animal welfare payment scheme as part of the 'Health Check' review implementation in the UK.

Finally, FAWC notes that two key proposals of the 'Health Check' review, the increase in milk quotas and the removal of set-aside, could both have negative environmental impacts. FAWC also notes that the review proposes to mitigate such impacts through cross compliance rules (where appropriate) and through agri-environmental measures. FAWC would like to see proposals that actively develop a more sustainable British agriculture with high animal welfare standards supported by appropriate payments to livestock producers both directly through the market place (which is likely to require labeling of welfare provenance) and through the use of Pillar 2 funds.

Yours sincerely



Professor Christopher Wathes
Chairman, Farm Animal Welfare Council