

Letter of 15 December 2003 to Defra regarding the proposed Animal Health and Welfare Strategy

1. Thank you for agreeing to an extension of the deadline for comments on the outline animal health and welfare strategy for GB to enable a full discussion at Council on our response. Thank you also for attending these discussions.

2. Our main observation is that the outline strategy remains a response to the exceptional animal disease outbreaks which have recently affected the GB livestock industry and rural economy without recognition of other relevant animal welfare issues which are equally important as disease prevention. The phrase ‘animal health and welfare’ is used as a composite word and is constantly used in contexts when mostly it means only health (or disease prevention). Moreover, there is little recognition in the strategy of any real implementation action in relation to welfare.

3. The Council is concerned that this strategy could lead to a movement of resources away from issues which directly impact on animal welfare to the wider human and societal issues which emerged as a result of BSE/FMD. These wider issues are clearly very important but should not be addressed at the expense of animal welfare. It is worth noting that only a small proportion of Defra’s funding of research into animal welfare, animal health and related public health issues (£32.8m in 2002/3) was spent directly on animal welfare and any further reduction would be unacceptable.

4. The inclusion of animal welfare as an independent issue with specific objectives, reflection on needs/problems; specifically targeted or justified actions; and defined means of impacting on animal welfare other than by raising health standards are pre-requisites if welfare is to form a meaningful component of the strategy:

- In Section 1.2 – A Strategy for Great Britain – prevention of diseases such as FMD is the only reason for the strategy that is explicitly stated. Since the strategy claims to be something larger and more comprehensive than a health strategy, it needs to be re-written to reflect other relevant animal welfare issues that are either left out entirely or only dealt with superficially.
- The widespread nature of some welfare problems should be conveyed in order to emphasise the importance of animal welfare in GB agriculture. For example, some studies have suggested that approximately 20% of the UK dairy herd have some physiological abnormality causing them to be lame. The role of good standards of animal welfare on disease prevention is also under reported.
- In section 3.2, the role and responsibility of “animal keepers” is described entirely in terms of disease. More disappointingly, section 3.9 – the role and responsibility of government – has no recognised or particular role in relation to animal welfare. The Section on animal welfare Section 3.10(iv) – refers to welfare in terms of disease. (“Most animal diseases and conditions compromise the animal’s welfare”). The reference to FAWC in this paragraph gives no indication of its role as the Government’s advisory body on farm animal welfare or the part that it will play in the ‘New Initiative’. The box

describing the New Initiative on page 17 is largely concerned with animal disease and by inference mainly with outbreaks of exceptional disease.

- The references to 'high minimum standards' and 'higher' standards of welfare are not meaningful without an explanation of what they actually mean. FAWC believes that farm animal welfare can be safeguarded as long as 'minimum acceptable welfare standards' are set, adequately monitored and rigorously enforced.
- Section 3.10 – The promotion and the protection of the welfare of animals should be placed higher up in the list of reasons given for Government intervention in animal health and welfare.
- In section 4.1 – the baseline from which the strategy will determine its priorities and progress is entirely disease-based without any mention of wider welfare issues such as housing conditions in relation to animal needs
- Under key challenges in section 4.12 the reference to welfare is only in relation to enforcement.
- Section 5.2 covers promotion of animal health with no mention of the need to promote welfare.
- Section 6.1 – A key point of the CAP reform agreement is that, for the first time, the main subsidies will be linked to compliance with EU standards covering, amongst others, animal welfare. As this point is relevant to delivery, it should be included in this section.
- In the Glossary - The definition attributed to Animal Welfare is incomplete and inaccurate. This should be reworded.

5. The role played by individual local authorities or the representative bodies. LGA/LACORS appears to be omitted in the sections on Partnerships/stakeholders. The framework agreement between Local Authorities and Government for the delivery of services in Animal Health and Welfare should be given emphasis as an important policy issue.

6. The strategy does not deal with a number of major public concerns over animal welfare, which FAWC has highlighted over many years. Issues that are particularly conspicuous by their absence are:

- housing/environments for farm animals in relation to their needs;
- transport and slaughter of farm animals;
- the impact of animal breeding on animal welfare; and
- endemic health issues emerging as a complex interaction between genotypes and environments (e.g. lameness in a range of species).

7. FAWC strongly supports herd and flock health planning as a mechanism for improving animal welfare. Most farm assurance schemes are taking this on board but

there is currently no mechanism for ensuring that all producers will participate in this initiative. Will the proposed EU food hygiene legislation where primary producers will be regarded as food producers have any impact in this context?

8. The issue of animal welfare on farm and the involvement of veterinary surgeons at this level are inextricably linked. Partnerships should exist between Defra, SVS, private veterinary surgeons and the farmers.

9. Good standards of husbandry and management on the farm are important factors in disease prevention but will also inevitably improve animal welfare. The strategy should deal with the effect of these factors at farm level on animal welfare. In particular, knowledge transfer and training should be addressed.

10. Communication issues and lines of communication should be formalised as a foundation for a communication strategy within the Animal Health and Welfare Strategy. Government together with the private and voluntary sectors should aim to provide the public with more information of how farm animals are kept under the various production systems.

11. The Animal Health and Welfare Strategy should be more closely linked with Defra's Veterinary Surveillance Strategy. Standards of animal welfare cannot be adequately managed the groundbase of data and ongoing assessment that veterinary surveillance should provide.

Farm Animal Welfare Council
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