

# **CONSULTATION ON THE FUTURE FOR FOOD IN SCOTLAND**

**Submission by Advocates for Animals**

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## **INTRODUCTION**

Advocates for Animals (Advocates) welcomes the opportunity to contribute to the consultation on a national food policy for Scotland. Advocates supports the view that Scotland must aim to guarantee a future where food is wholesome, healthy and produced in an environmentally- and animal-welfare-friendly way.

We believe the provision of verifiable standards of good animal welfare is not only an ethical imperative, but also adds value for consumers. Advocates therefore believes that achieving high standards of animal welfare should be central to a national food policy for Scotland.

Advocates believes that a national food policy should aim to ensure:

- that Scotland's consumers have access to wholesome, affordable food;
- that animals reared for food production are always treated with respect and humanity;
- that consumers are provided with the information they need to make informed ethical choices;
- that the effects of diet choices on public health are acknowledged and addressed;
- that the effects of food production on the environment are acknowledged and addressed;
- that public procurement policies make high animal welfare standards a requirement.

## **SUMMARY OF RECOMMENDATIONS**

Advocates for Animals believes the Scottish Government should:

- ensure that achievement of high standards of animal welfare is a central part of a national food policy for Scotland;
- improve labelling of animal products to provide consumers with clear information on welfare standards;
- adopt policies aimed at reducing overall consumption of animal products and replacing intensively-produced animal products with healthier free-range and organic produce, as part of the drive to tackle obesity and reduce the impact of food production on the environment;
- lead by example by ensuring that high standards of animal welfare are a requirement in public procurement policies;
- encourage retailers to include animal welfare in their corporate social responsibility policies, ensure fair pricing of high welfare products, promote sales of high welfare products and adopt specific schemes to improve farmed animal welfare;
- encourage producers to view improving welfare as an opportunity rather than a threat and provide support for organic and other high welfare production systems;
- provide support for local authority animal health and welfare services;
- seek to establish Scotland as a world leader in the production and supply of high welfare produce.

## CONSUMER AND SOCIAL ISSUES

### Consumer choices

For many people a logical extension of their concern for animal welfare is a decision to reduce or eliminate consumption of meat and other animal products. Advocates recognises that, currently, most people prefer to have some meat in their diet and as long as this is the case, the Government should ensure that the livestock industry in Scotland strives for the highest possible animal welfare standards.

Eurobarometer surveys on consumer attitudes to the welfare of farmed animals, published by the EU Health and Consumer Protection Directorate, show that consumers attach a high level of importance to the protection of farmed animal welfare (average rating of 8 out of 10) and that 77% believe the welfare protection of farmed animals needs to be improved<sup>1</sup>.

74% of consumers believe they can improve animal welfare through their shopping choices and a majority are willing to pay more for animal welfare-friendly food products and would be prepared to change their usual place of shopping in order to be able to buy more animal welfare-friendly products<sup>2 3</sup>. However, the surveys also reveal consumer concern that such products are difficult to identify, with 55% believing current labelling does not allow them to identify products sourced from animal welfare-friendly production systems<sup>4</sup>.

Advocates believes that improved labelling is essential to enable consumers to make informed choices and would urge the Scottish Government to press for progress on the proposal in the EU Action Plan for Animal Health and Welfare 2006 – 2010 for an EU animal welfare labelling system. Until this is introduced, the Scottish Government should offer guidance on, and encouragement towards, the clear and honest welfare labelling of animal-based products as a means of satisfying consumer preferences, enhancing animal welfare and informing the general public.

### Public health issues

The current high levels of consumption of animal products in the western diet are damaging for our health. Advocates believes that Government should help the public towards a fuller understanding of the health benefits of a plant-based diet, which carries a reduced risk of bowel cancer, heart disease, hypertension, obesity, diabetes and osteoporosis.

The over-consumption of energy-dense foods such as animal products is fuelling a global obesity crisis<sup>5</sup>. A discussion paper published by the UK Government-sponsored National Committee on Nutrition Education states that meat and dairy products make up about 60% of our total consumption of fat and should be reduced

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<sup>1</sup> *Attitudes of EU citizens towards animal welfare.*, Special Eurobarometer 270, March 2007.

[http://ec.europa.eu/public\\_opinion/archives/ebs/ebs\\_270\\_en.pdf](http://ec.europa.eu/public_opinion/archives/ebs/ebs_270_en.pdf)

<sup>2</sup> *Attitudes of consumers towards the welfare of farmed animals.* Special Eurobarometer 229, June 2005. [http://ec.europa.eu/food/animal/welfare/euro\\_barometer25\\_en.pdf](http://ec.europa.eu/food/animal/welfare/euro_barometer25_en.pdf)

<sup>3</sup> *Ibid.* Special Eurobarometer 270.

<sup>4</sup> *Ibid.* Special Eurobarometer 270.

<sup>5</sup> WHO Europe (2006) *Draft European Charter on counteracting obesity*, 18 September 2006. EUR/06/5062700/8.

substantially<sup>6</sup>. Obesity is a serious public health concern in Scotland and the rising levels of obesity in children are particularly concerning. The number of obese children in Scotland is double the UK average: an NHS survey found that more than a third of 12-year-olds are overweight, 19% obese and 11% severely obese and that one fifth of children aged three-and-a-half are overweight, 9% obese and 4% severely obese<sup>7</sup>. Obesity can lead to a number of secondary health problems including cardiovascular disease, type II diabetes, several cancers and arthritis<sup>8</sup>.

There is an inherent contradiction between a public health policy that aims to reduce obesity and other health problems, and a food production policy that promotes greater consumption of red meat – such as the current “Pork on the fork” campaign, which is supported by the Scottish Government. Advocates would like to see Scotland’s food policy address that contradiction, and to be confident that support for the local farming industry is based on accurate representation of all the relevant facts.

Advocates believes that all consumer material about meat consumption should be based on the fullest and most up-to-date information available. This is particularly relevant in light of the recent promotional campaign by Scotland’s red meat promotion body, Quality Meat Scotland, with funding from Scottish Enterprise, intended to counter any negative publicity arising from the findings of the World Cancer Research Fund (WCRF) report with regard to the link between red meat consumption and colo-rectal cancer, and to minimise the impact of the WCRF report on retail sales to the consumer<sup>9</sup>. The WCRF report concludes that the evidence that red meat is a cause of colorectal cancer is stronger than ever before and recommends that people who eat red meat should limit consumption to less than 500g a week and that population average consumption should be no more than 300g per person per week. The report also concludes that there is convincing evidence that processed meats, including bacon and ham, increase the risk of colo-rectal cancer and advises that these should be avoided<sup>10</sup>.

It is not just excessive consumption of red meat that is damaging to our health. UK consumption of poultry has doubled in the last thirty years. In 1974, individuals in the UK purchased 132 grams of poultry per week, whereas in 2005/6, they purchased 260 grams per week, in addition to 152 grams of ready meals<sup>11</sup>, which are very frequently based on chicken. This growth in demand has been met through chickens reared at high stocking densities in intensive systems and selectively bred to grow so quickly that many suffer from painful leg disorders and heart failure. Research at the University of Bristol reveals that over 97% of commercial meat chickens in the UK have some degree of leg problem and over a quarter have significant difficulty walking<sup>12</sup>.

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<sup>6</sup> NACNE reported in Cannon, G. and Walker, C. (1984) *The Food Scandal*. Century Publishing.

<sup>7</sup> <http://news.bbc.co.uk/1/hi/scotland/4520618.stm>

<sup>8</sup> WHO/FAO (2003) *Diet, Nutrition and the prevention of chronic diseases*. Report of a joint WHO/FAO expert consultation. WHO Technical Report Series 916. World Health Organisation (WHO) and Food and Agriculture Organisation of the United Nations (FAO).

<sup>9</sup> Quality Meat Scotland Briefing Paper, *Red Meat Health Benefits Activity*, August 2007.

<sup>10</sup> World Cancer Research Fund / American Institute for Cancer Research (2007) *Food, Nutrition, Physical Activity, and the Prevention of Cancer: a Global Perspective*. Washington DC: AICR. [http://www.dietandcancerreport.org/downloads/chapters/chapter\\_12.pdf](http://www.dietandcancerreport.org/downloads/chapters/chapter_12.pdf)

<sup>11</sup> TSO, London (2007) *Family Food in 2005-06* A National Statistics Publication by DEFRA <http://www.fao.org/docrep/005/AC911E/AC911E00.HTM>

<sup>12</sup> Knowles TG, Kestin SC, Haslam SM, Brown SN, Green LE, et al. (2008) Leg Disorders in Broiler Chickens: Prevalence, Risk Factors and Prevention. *PLoS ONE* 3(2): e1545. doi:10.1371/journal.pone.0001545. <http://www.plosone.org/article/info:doi%2F10.1371%2Fjournal.pone.0001545>

Chicken has traditionally been promoted as a low-fat high-protein food. However, a typical supermarket chicken today contains proportionally 2.7 times as much fat and 30% less protein than in 1970 and now contains nearly 40% more fat than protein<sup>13</sup>. Professor Michael Crawford of the Institute of Brain Chemistry and Human Nutrition at London Metropolitan University suggests that the explanation may be that traditionally reared chickens used to be active and eat vegetation and seeds, whereas modern intensively reared chickens are fed on high energy foods and are very inactive; he concluded that these changes in the intensive chicken's diet and rearing system may be contributing to rising levels of obesity in people<sup>14</sup>.

Chicken produced to higher welfare standards is healthier for human consumers. Organic chicken has 25% less fat than intensively reared chicken and contains more protein than fat<sup>15</sup>. Meat from free-range chickens and from slower-growing breeds also contains less fat<sup>16 17</sup>.

Whilst it is desirable to reduce overall fat consumption, especially saturated and trans fats, there is concern that the Omega-3 content of modern diets is often too low relative to overall fat consumption. Omega-3 fatty acids (which can be derived from both plant and animal sources) are important for healthy brain function and the prevention of heart disease. The amount of the Omega-3 fatty acid, DHA, in a typical supermarket chicken decreased by 85% between 1980 and 2004<sup>18</sup>. Organic chicken contains 38% more Omega-3 than non-organic chicken<sup>19</sup> and meat from free-range chickens and from slower-growing breeds also contains higher levels of Omega-3<sup>20</sup>. Similarly, organic milk contains higher levels of Omega-3 compared with conventional milk<sup>21</sup>.

Advocates welcomes the fact that the Scottish Government is making it a priority to tackle obesity and believes that policies aimed at reducing overall consumption of animal products and substituting intensively-produced animal products with healthier free-range and organic produce should be central to this.

## Environmental protection

Over-consumption of animal products is not only damaging for our health but is also unsustainable. Advocates welcomes the Scottish Government's acknowledgement that our food choices have an impact on the environment and believes the

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<sup>13</sup> Wang YQ, Thomas B, Ghebremeskel K and Crawford MA (2004) *Changes in Protein and Fat Balance of Some Primary Foods: Implications for Obesity*, Institute of Brain Chemistry and Human Nutrition, London Metropolitan University. Presented at the 6th Congress of the International Society for the Study of Fatty Acids and Lipids, 27 June - 1 July 2004, Brighton, UK.

<sup>14</sup> *Ibid.* Wang *et al* (2004).

<sup>15</sup> *Ibid.* Wang *et al* (2004).

<sup>16</sup> Holcman, A, Vadjal, R., Zlender, B and Stibilj, V. (2003) Chemical composition of chicken meat from free range and extensive indoor rearing, *Arch. Geflugelk.* **67** (3): 120-124.

<sup>17</sup> Castellini, C., Mugnai, C. and Dal Bosco, A. (2002) Meat quality of three chicken genotypes reared according to the organic system, *Ital. J. Food Sci.* **14** (4): 401-412.

<sup>18</sup> *Ibid.* Wang *et al* (2004).

<sup>19</sup> *Ibid.* Castellini *et al* (2002).

<sup>20</sup> Polak, T., Holcman, A., Stibilj, V. and Zlender, B. (2002) The fatty acid composition of broilers from free range rearing, *Zb. Bioteh. Fak. Univ. Ljublj., Kmet. Zootch.* **80** (1): 71-80

<sup>21</sup> Ellis, K. A. Innocent, G., Grove-White, D. *et al* (2006) Comparing the fatty acid composition of organic and conventional milk. *Journal of Dairy Science*, **89**: 1938-1950.

environmental consequences of livestock rearing should be considered as part of Scotland's national food policy.

Livestock production is responsible for 18% of global greenhouse gas emissions from human activities, measured in CO<sub>2</sub> equivalent<sup>22</sup>; this is a higher share than transport, which accounts for 14%<sup>23</sup>. Emissions from agriculture contribute 13% of Scotland's total greenhouse gas emissions and enteric fermentation from cattle is the largest single source of methane emissions in Scotland, contributing nearly 40% of total Scottish methane emissions<sup>24</sup>.

Livestock production is also responsible for 64% of global ammonia emissions, which contribute to air, soil and water pollution, acid rain and damage to the ozone layer<sup>25</sup>. The UN Food and Agriculture Organisation (FAO) states that "The livestock sector has such deep and wide ranging impacts that it should rank as one of the leading focuses for environmental policy."<sup>26</sup>

Intensive animal production systems are particularly damaging in terms of the heavy demands placed on natural resources of land and water to grow animal feed-crops. One third of the world's total arable land is used for animal feed-crop production; over 90% of the world's soya beans and 60% of maize and barley are grown for livestock feed<sup>27</sup>. Diets high in meat and dairy products are less energy efficient and have a higher carbon footprint compared with diets high in plant-based foods<sup>28</sup>.

## **ANIMAL WELFARE ISSUES**

### **Mutilations, transport and slaughter**

There are three points in the lives of all farmed animals where they are particularly vulnerable to practices that cause suffering, either because of the procedure itself or from carelessness or bad handling.

On-farm management of animals usually involves a large number of "mutilations" – procedures involving interference with the bone structure or sensitive tissue. These range from the castration and tail-docking of lambs and the tail-docking and tooth-clipping of piglets, to the beak-trimming of poultry, de-horning of cattle and sheep, and the use of tattoos, ear-notching and toe-removal for identification of various species.

For more information see Advocates for Animals' report *Painful Reality: Why painful mutilations of animals must be reviewed*  
<http://www.advocatesforanimals.org/pdf/painfulreality.pdf>

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<sup>22</sup> Steinfeld, H. *et al* (2006) *Livestock's Long Shadow: environmental issues and options*, Food and Agriculture Organisation of the United Nations, Rome.

<sup>23</sup> *Ibid.* Steinfeld *et al* (2006).

<sup>24</sup> AEA (2007) *Greenhouse Gas Inventories for England, Scotland, Wales and Northern Ireland 1990-2005*. [http://www.airquality.co.uk/archive/reports/cat07/0709180907\\_DA\\_GHGI\\_report\\_2005.pdf](http://www.airquality.co.uk/archive/reports/cat07/0709180907_DA_GHGI_report_2005.pdf)

<sup>25</sup> *Ibid.* Steinfeld *et al* (2006).

<sup>26</sup> *Ibid.* Steinfeld *et al* (2006).

<sup>27</sup> CIWF (2008) *Global Warning: Climate Change and Farm Animal Welfare*. Compassion in World Farming.

<sup>28</sup> *Ibid.* CIWF (2008).

Transport imposes many stresses on animals such as loading and unloading, unfamiliar surroundings and mixing of unfamiliar animals, overcrowding and extremes of heat, cold, hunger and thirst. While transport legislation in the UK is generally thought to be better observed and enforced than in other countries the same cannot be said of all countries in Europe and beyond.

Modern slaughterhouses are designed to kill large numbers of animals at a rapid pace. Automated fast production lines, where animals are treated as units on a conveyor belt rather than individual sentient creatures, have the potential to cause suffering.

Advocates opposes the slaughter of animals without pre-stunning, which is often conducted for religious purposes. Whilst we are aware of religious sensitivities, we believe that all religions should be respectful of the animal kingdom. We also believe that governments have a duty to ensure that all animals killed for food are spared unnecessary suffering.

Advocates believes that animals should be slaughtered as close as possible to the place of production. If suitable on-farm slaughter is not possible – and usually, it is not – then slaughter should take place at the nearest suitable abattoir. Public policies, such as public procurement standards, should specify slaughter as close as possible to the place of production. Smaller local abattoirs can have some welfare advantages over the larger ones. They tend to have a lower throughput, so that animals are more likely to be treated as individuals, rather than units. However, they may not have the resources to provide a specially trained animal welfare officer or specialist lairage or penning facilities, or to work to enhanced quality assurance standards. Larger abattoirs may only deal with a single species and are thus more likely to have specialist staff, facilities and policies; on the other hand they are likely to be more subject to time and productivity pressures.

Purchasers' inspection of abattoirs, allied with requirements for optimum welfare, can influence standards and help to ensure that animals slaughtered for human consumption are treated with as much respect as possible.

### **Promoting high welfare production systems and practices**

The benefits of organic farming systems for human health and animal welfare are widely acknowledged. In 2007, Motion S3M-716 in the name of Sarah Boyack MSP asked the Scottish Government to step up support for organic produce in the light of recent EU-funded research showing the health benefits of organic foods. Advocates supported this Motion, as organic livestock production requires considerably higher animal welfare standards than conventional basic standard production, including lower stocking densities, reduction of transport and prohibition or reduction of mutilations.

Free-range and enriched indoor (e.g. RSPCA Freedom Food) farming systems also offer many welfare advantages over intensive systems, including more space and environmental complexity and opportunities to express important natural behaviours, such as rooting, foraging and wallowing in pigs and foraging, perching and dustbathing in poultry. Providing an enriched environment with opportunities for foraging can reduce problems with tail-biting in pigs and feather-pecking and cannibalism in poultry and thus eliminate any perceived need for certain mutilations.

Consumers should, however, be made aware that the standards for membership of some quality assurance schemes, such as Quality Meat Scotland, are often the same as – or little more than - the basic minimum legal welfare standards, with which every producer is required to comply.

Advocates welcomes the development of a new strategy for Scotland's aquaculture industry<sup>29</sup> and believes that improving welfare standards should be a key focus of the new strategy. Intensively farmed fish suffer from a range of welfare problems including overcrowding, physical injuries (e.g. fin erosion), eye cataracts, skeletal deformities, soft tissue anomalies, increased susceptibility to disease, sea lice infestation, high mortality rates, pre-slaughter starvation and, in some cases, inhumane slaughter methods<sup>30</sup>. Organic and RSPCA Freedom Food standards should form the basis of welfare standards across the whole aquaculture sector, including a reduction in stocking densities, limits on transport, a general prohibition of predator killing, a reduction in pre-slaughter starvation periods and prohibition of inhumane slaughter methods.

## Producers

Raising standards of animal welfare is often seen by producers as a threat to profitability. Advocates believes that high welfare standards should be viewed as an opportunity rather than a threat and that improving welfare can increase profitability. Production in developing countries can be so cheap that Scotland is often not able to compete on price alone, but it can still focus more on high quality, which must include high welfare standards.

Producer margins are generally greater for higher welfare production systems. For example, gross margins for free-range egg production are around twice as high as those for battery egg production<sup>31</sup>.

The production costs of chicken produced to Freedom Food standards are only marginally higher than for standard chicken and Freedom Food production may actually be more profitable, even without taking into account the premium paid to producers, because the improved welfare of the birds results in lower mortality rates and a greater proportion of grade 'A' carcasses compared with standard production<sup>32</sup>.

Modern dairy cattle have been selectively bred for unsustainably high levels of milk production. As a result, many suffer from infertility, chronic mastitis and lameness and the average cow now completes only around three lactations before being culled. Production efficiency over the lifetime of the animal is increased if cows are able to complete more lactations, so it would be more profitable to have a lower yield per lactation sustained over more lactations<sup>33</sup>. Breeding for improved health and

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<sup>29</sup> <http://www.scotland.gov.uk/News/Releases/2007/10/30112913>

<sup>30</sup> Stevenson, P (2007) *Closed Waters: The Welfare of Farmed Atlantic Salmon, Rainbow Trout, Atlantic Cod and Atlantic Halibut*. CIWF/WSPA.

<sup>31</sup> European Commission (2004) *Study on the socio-economic implications of the various systems to keep laying hens*. Final report for the European Commission submitted by Agra CEAS Consulting Ltd, December 2004.

<sup>32</sup> RSPCA (2006) *Everyone's a Winner – how rearing chickens to higher welfare standards can benefit the chicken, producer, retailer and consumer*.

<sup>33</sup> Webster, A. J. F. (2000) Sustaining fitness and welfare in the dairy cow. *Proceedings of the New Zealand Society of Animal Production*, **60**: 207-213.

welfare, which must include breeding for lower milk production, would therefore be beneficial for farmers as well as for the cow.

## Retailers

Retailers have an important role to play in encouraging and auditing high welfare standards, promoting high welfare products to consumers and ensuring the affordability of welfare-friendly products. Many companies have adopted corporate social responsibility (CSR) policies focusing on social and environmental issues. As part of Scotland's national food policy, retailers should be encouraged to follow the example of those companies that have extended their CSR policies to include animal welfare. Advocates believes there is not only an ethical case but also a sound business case for doing so.

Advocates recognises that the current pricing of free-range and organic products may deter some consumers. The difference in production costs of free-range and standard animal products is often much less than the difference in retail price. For example, free-range chicken costs around 74p per kg more to produce than standard intensively-produced chicken, yet major retailers charge on average £1.24 extra per kg for free-range<sup>34</sup>. Similarly, free-range eggs cost around 1.7p extra per egg to produce compared with cage eggs, yet major retailers charge on average an extra 6.8p per egg<sup>35</sup>. Retailers should be encouraged to make high welfare products more affordable to consumers. A national food policy for Scotland should aim not only to promote free-range and organic produce but also to raise baseline welfare standards so that all consumers can be confident of the welfare standards of the food they purchase. Sainsbury's has recently committed to converting all of its standard chicken to RSPCA Freedom Food standard or equivalent. This represents a huge step forward in making higher welfare products accessible and affordable for the majority of consumers and other retailers should be encouraged to take similar steps.

Over 60% of laying hens in the UK are still confined in battery cages, where they have less space than the area of an A4 sheet of paper per bird and are unable to flap their wings or carry out important natural behaviour including nesting, perching, foraging and dustbathing. The conventional battery cage will be banned across the European Union from 2012. Several major retailers have already committed to only selling and using non-cage eggs. For example, Marks & Spencer sells only free-range shell eggs and uses only free-range egg ingredient across its entire product range. Waitrose and Co-op sell only free-range shell eggs and have committed to using only free-range egg ingredient in their own label products by 2009 and 2010 respectively. Sainsbury's is the first of the "big four" supermarkets to commit to only selling non-cage shell eggs and using non-cage egg ingredient by 2010.

Many dairy bull calves are currently exported to the continent to be reared for veal. Young calves are particularly poorly adapted to cope with transport because their immune system and stress response are not yet fully developed. As a result, they suffer high rates of morbidity and mortality both during and in the few weeks immediately following transport<sup>36</sup>. Most exported calves are likely to be reared in barren slatted systems that would be illegal in Scotland. Tesco has announced that

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<sup>34</sup> Source: Industry data and online prices at ASDA, Sainsbury's and Tesco as at 10 January 2008.

<sup>35</sup> Source: University of Manchester, BEIC, NFU and BEIS and online prices at ASDA, Sainsbury's and Tesco as at 20 April 2008.

<sup>36</sup> Knowles T. G. (1995) A review of post transport mortality among younger calves. *Veterinary Record* **137**: 406-407.

as of January 2008, each of the 930 dairy farmers supplying milk to Tesco must demonstrate that they either rear their own calves, sell to a known farmer who does not export, or sell the calves into one of their dedicated UK rearing supply chains (high-welfare straw-bedded group-housed calf rearing units)<sup>37</sup>. This welcome move will protect the welfare of calves as well as supporting UK producers and other major retailers should be encouraged to implement similar measures.

## Public procurement

The Scottish Government should lead by example by ensuring that high standards of animal welfare are a requirement in public procurement policies. Specification for public procurement in many public bodies includes ethical issues such as fair trade and environmental impact; there is a strong case for extending this to animal welfare.

Some local authorities are already taking the initiative. For example, Midlothian Council sources only free-range eggs. This policy should be extended to other animal products and other local authorities should be encouraged to follow suit. In doing so, they will not only be benefiting animal welfare and consumers but also protecting Scottish producers from imports of lower welfare products from outside the EU, such as eggs from hens kept in conventional battery cages when these cages are banned in the EU from 2012.

## Ensuring compliance with welfare standards

Advocates believes that food production policy should include regular, independent inspection of animal welfare in all production units. As long ago as 1999 the Farm Animal Welfare Council (FAWC) recommended an increase in the number of unannounced State Veterinary Service (now Animal Health) inspections, particularly at intensive pig and poultry farms<sup>38</sup>. In 2006, however, only 7% of Scottish pig farms were inspected for any reason, and only 1% of poultry units (Table 1)<sup>39</sup>.

**Table 1:** Summary of percentages of farm animal units inspected by Animal Health (formerly the State Veterinary Service) in 2006 and the first six months of 2007.

Source: Answer to Written Question S3W-1878.

	2006	2007 (first 6 months)
Pigs	7	4
Sheep	1.7	1
Dairy cattle	1.4	1.2
Beef cattle	2.2	2.3
Poultry	1	0.5
Laying hen	0.5	0.4
Other	1.6	0.7

Scottish local authorities have a statutory duty to enforce animal health and welfare legislation, but they are hard-pressed to meet this obligation. Scotland currently has 35,790 livestock holdings, 29 markets and 43 import / export locations – but only 33.6

<sup>37</sup> <http://www.tescocorporate.com/page.aspx?pointerid=1E653FBF8FD94BA184311AF3A89481F5>

<sup>38</sup> Advice to Ministers – *Enforcement of Animal Welfare Legislation: Update by the Farm Animal Welfare Council*, July 1999 (Section A(iv)).

<sup>39</sup> Answer to Written Question S3W-1878.

specialist animal health inspectors are employed within 21 of the 32 Scottish local authorities to enforce the legislation.

In England and Wales, many local authorities have a Framework Agreement with DEFRA which allows for joint working with Divisional Veterinary Managers, allowing for best use of resources and reducing the regulatory burden on businesses. In Scotland, no such agreement exists and the local authority animal health and welfare services receive no direct support from the Scottish Government.

Local authorities pointed out recently that “The proposed £1.6bn rural development programme and Scottish food policy, due to commence in 2008, will rely on Scotland being able to prove its effectiveness in the control of matters relating to animal health and welfare to the Food and Veterinary Office (FVO) of the European Union.”<sup>40</sup> Resourcing and delivery of these services are therefore essential, for the sake of the animals used in production, to meet legal obligations and to meet public expectations.

More must be done to ensure compliance with welfare legislation and codes of practice. For example, EU legislation requires that pigs be provided with manipulable material, such as straw, and prohibits the routine tail-docking of piglets<sup>41</sup>. Despite this, many pig farmers are failing to provide straw or other suitable manipulable material and continue to tail-dock piglets routinely. A Scottish opinion survey carried out to coincide with publication of Advocates’ report *Painful Reality: Why Painful Animal Mutilations Must Be Reviewed*<sup>42</sup> found that nearly two thirds (63%) of people interviewed were unaware that millions of young farmed animals were subjected to mutilations in Scotland each year without pain relief. At the same time, nearly two thirds (62%) of people said they would prefer to buy meat and other animal products derived from animals that had not been subjected to mutilations. A ban on the beak-trimming of laying hens is due to come into force in Scotland (and across the UK) on 1<sup>st</sup> January 2011<sup>43</sup>. Steps should be taken now to encourage producers to work towards managing flocks without beak-trimming in preparation for the ban.

### **Meeting the increasing demand for high welfare products**

Sales of high welfare products have been increasing over recent years. As far back as 2006, retailers were struggling to meet the demand for free-range products and resorting to importing high welfare produce from abroad<sup>44</sup>. Sales of free-range eggs have overtaken sales of caged eggs and sales of organic produce have risen more than four-fold since 2000<sup>45</sup>. Following recent TV programmes in which celebrity chefs Hugh Fearnley-Whittingstall and Jamie Oliver highlighted the reality of intensive chicken meat and egg production, there has been a surge in demand for free-range chicken meat and eggs<sup>46</sup>, which is likely to further increase the gap between supply and demand for high welfare products in the UK.

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<sup>40</sup> COSLA Executive Group on Community Wellbeing and Safety, Meeting Jan 2008, Agenda Item 9 – Better Regulation Update.

<sup>41</sup> Commission Directive 2001/93/EC of 9 November 2001 amending Directive 91/630/EEC laying down minimum standards for the protection of pigs.

<sup>42</sup> <http://www.advocatesforanimals.org/pdf/painfulreality.pdf>

<sup>43</sup> The Prohibited Procedures on Protected Animals (Exemptions) (Scotland) Regulations 2007.

[http://www.oqps.gov.uk/legislation/ssi/ssi2007/plain/ssi\\_20070256\\_en](http://www.oqps.gov.uk/legislation/ssi/ssi2007/plain/ssi_20070256_en)

<sup>44</sup> <http://www.timesonline.co.uk/tol/news/uk/health/article639481.ece>

<sup>45</sup> <http://www.guardian.co.uk/environment/2008/apr/01/food.ethicalliving>

<sup>46</sup> <http://www.independent.co.uk/life-style/food-and-drink/news/shoppers-frustrated-as-freerange-birds-fly-off-shelves-788558.html>

There is an opportunity for Scottish producers to increase free-range production to meet this increased demand across the UK. Some producers are already responding and others should be encouraged to follow their example. Scotland's biggest chicken producer is aiming to double its weekly output of free-range birds: Grampian Country Food Group plans to increase free-range production from 45 000 to 90 000 a week and boost organic output by 5,000 birds weekly to 20 000. Farmlay, near Strichen in Aberdeenshire, plans to add 30,000 dozen free-range eggs to its weekly production in response to the increase in free-range sales<sup>47</sup>.

Many more producers would be likely to invest in higher welfare systems if financial support was made available. Support can be provided under the EU Rural Development Regulation<sup>48</sup> (RDR) to assist producers with meeting newly introduced EU standards. With the impending ban on battery cages in 2012, this could be used to help egg producers with the costs of moving to non-cage systems. Support with part of the capital costs can be given under the RDR's "Modernisation of Agricultural Holdings" measure and a partial contribution can be made for up to five years to the additional running costs under the RDR's "Meeting Standards" measure. The Scottish Government should make full use of these measures to encourage more producers to invest in non-cage systems for laying hens.

Demand for free-range pork is also increasing but there is concern from the industry that lack of action from government could limit supplies<sup>49</sup>. A national food policy for Scotland should seek to take advantage of the increasing demand for welfare-friendly products and establish Scotland as a world leader in the production and supply of high welfare produce.

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<http://www.independent.co.uk/life-style/food-and-drink/news/the-campaign-that-changed-the-eating-habits-of-a-nation-788557.html>

<sup>47</sup> [http://www.theherald.co.uk/search/display.var.2096758.0.poultry\\_firm\\_follows\\_chefs\\_free\\_range\\_tips.php](http://www.theherald.co.uk/search/display.var.2096758.0.poultry_firm_follows_chefs_free_range_tips.php)

<sup>48</sup> Council Regulation (EC) No. 1698/2005 of 20 September 2005 on support for rural development by the European Agricultural Fund for Rural Development (EAFRD).

<sup>49</sup> <http://www.thepigsite.com/swinenews/16942/demand-for-freerange-pork-increases>