

Consultation on FAWC: 'A long term strategy for farm animal welfare in Great Britain – ethical principles & welfare assessment, surveillance and standards'
September – December 2006

Submission by Advocates for Animals

1. Views of stakeholders on future strategy:

Historically, FAWC has been a pioneer in the UK and also a model internationally. However, farmed animal welfare in the UK is still much less than adequate, let alone optimal, and some sectors or practices remain completely unacceptable. For the future, Advocates for Animals believes that there are a number of (interrelated) changes in approach that are necessary if FAWC is to achieve an adequate level of welfare for farmed animals, and we would like to see the 20-year strategy incorporate these changes.

1.1 Consistency of welfare protection between different categories of animal.

FAWC should challenge, and never appear to tolerate, inconsistency between welfare standards 1. that relate to farmed animals compared with animals under the control of humans for other purposes (companion animals, zoo animals); 2. that appear to arise from unscientific differentiation between farmed species (for example, between mammals and birds or fish).

Inconsistencies exist both in law and in society's differential expectations, and we suggest that FAWC should challenge both these areas, whenever the capacity for suffering and the welfare interests of farmed animals are seen to be morally downgraded compared to those of animals who are in a more favoured relationship to people. Obvious examples are in the different requirements for pain relief during painful procedures such as castration (at least at some ages) and the differences in requirements for stocking density, housing, transport and killing methods accepted by society for farmed animals compared, say, to companion dogs or horses. These differences cannot be justified either by science or by an ethical position that takes animal welfare seriously. FAWC should make it one of one of the 20-year objectives to bring farmed animal protection up to the same legal protection as that given to companion animals.

Equally, we believe that farmed animals such as birds or fish have historically had less recognition of their welfare needs because of lack of knowledge of the species concerned, as well as more general lack of empathy with animals that are so different from humans. For example, we doubt whether mammals would ever be treated quite as badly as broiler chickens. This is another anomaly that FAWC could usefully address.

1.2 Priority of welfare

The FAWC role should be to assess welfare and to advise on measures to improve welfare, independently of considerations about the economic or management implications of the advice.

There are several other organisations, including DEFRA, that advise Ministers and lobby on the impact of welfare measures on the economics and management of farming. FAWC, however, has a special role: 'to keep under review the welfare of farmed animals on agricultural land, at market, in transit and at the place of slaughter; and to advise government and the devolved administrations in Scotland and Wales of any legislative or other changes that may be necessary'¹; in other words, to be a voice for farmed animal welfare. It may be objected that FAWC would lose credibility if it were to give advice on welfare that others might see as one-sided. However, we believe that if FAWC made its unique position clearer, its credibility in the debate would increase. We believe that FAWC should ask more and expect more of the farming industry and of government (including the devolved administrations) during the next 20 years than it has in the past.

We believe that, as government has a responsibility to provide for the welfare of animals in England, Scotland and Wales, it should adopt a default position of implementing and following FAWC recommendations. This would apply equally to devolved administrations. Where this does not occur, the government or administration should be required to explain its reasons.

1.3 Implementation of FAWC recommendations.

FAWC should provide annual updates to the public on the speed of implementation, or the non-implementation or rejection (recently, of most of the FAWC recommendations on animal breeding²), of its previous recommendations to government. This would offer the public some clarity on governmental commitment to pursuing animal welfare measures.

1.4 Engagement in public debate

FAWC should aim over the next 10 years to become much better known to the public as a source of information about, and advocate for, farmed animal welfare. This should involve challenging government in public when necessary.

A higher public profile would make it harder for government and the farming industry to delay or fail in implementing FAWC recommendations. Being intended for government, FAWC reports are not particularly suitable for a general readership. One possibility would be for 'public education versions' of the reports to be published, giving a clear explanation of welfare problems found and recommendations for their solution, which could be published on the FAWC website and distributed to libraries, schools and colleges.

2. Ethical principles relating to treatment of farmed animals:

We agree that it is timely for FAWC to review the ethical principles underlying its work, in view of the fact that the ethics of animal use have now become a mainstream subject of philosophical investigation³ and public interest.

FAWC has stated in a recent report⁴: 'We have a moral obligation to each individual animal that we use. This obligation includes never causing certain serious harms to farm animals and, when deciding on our actions, endeavouring to balance any other harms against benefits to humans and other animals.' We would like to see FAWC rebalance the ethical basis of its decision-making so that respect for the intrinsic value (and, indeed, the right not to be harmed) of each animal takes precedence over the predominantly utilitarian, cost-benefit, analysis illustrated in the statement above. We believe that in the past the interests (or convenience) of humans have too often been given precedence over the interests of farmed animals.

Farmed animals are sentient beings entirely under the control of their owners, stockpeople or handlers, putting their welfare squarely within the responsibility of their owners and users. In view of this, Advocates for Animals believes that the basic ethical principle in relation to farmed animals should be the following:

Animal farming activities should be conducted only in such a way that they do not impose pain or other suffering on animals or fail to prevent suffering that is directly or indirectly a consequence of the fact that the animal is being farmed.

(This is of course the principle behind the Five Freedoms.)

In particular we are concerned that FAWC should protect the ethical principle behind the Five Freedoms from being misused, weakened or misinterpreted. FAWC should not condone arguments that use common farming methods or the alleged impracticality of changing methods or systems as a justification for practices that result in suffering. For example, we believe that FAWC could take a stronger ethical position in future when animals are subjected to suffering on the grounds that worse suffering is thereby avoided (for example, tail-docking of lambs and piglets, the use of farrowing crates, de-horning, de-beaking of hens, feed restriction of broiler breeders, castration without anaesthesia). In these cases, the problems that the interventions are intended to solve are themselves almost always the result of certain farming or breeding practices which could and should be changed.

We recognise that there is a continuum of ethical views on farmed animal use and farmed animal welfare⁵ and that society as a whole may wish to balance animal welfare with the perceived welfare of producers or consumers (see below). However, referring back to 1.2, we believe that FAWC can be most effective by focusing on the principle of

the Five Freedoms and strengthening its interpretation, rather than seeking 'consensus'⁶ which could result in a 'lowest common denominator' approach to animal welfare.

2.1 Extension of the Five Freedoms

We believe that the recognition of the intrinsic value of each animal requires an extension of the Five Freedoms. The existing Five Freedoms, rightly, focus on what is required in order to protect farmed animals from suffering. However, sentient animals also have the capacity for enjoyment and for positive emotions. We would like to see the Five Freedoms extended to include a requirement to promote the positive health and happiness of farmed animals by providing conditions that allow them a high quality of life. Such an approach is already accepted by almost the whole of society in the case of companion animals and it is time to extend it to farmed animals.

3. Future standards and strategies

Another FAWC strategic aim for the next 20 years should be to see the UK (and the EU) leading the world in high standards of animal welfare in farming. We agree with FAWC^{1,4} that there are opportunities for raising welfare standards as a result of the globalisation of agriculture coupled with the increasing interest of EU citizens in the provenance and production methods of food and/or animal welfare. Given that intensive animal farming has an increasingly unfavourable public image in the UK, an important section of public opinion is likely to be supportive of FAWC in making the case for high welfare. We believe the public would support FAWC in calling for UK welfare legislation to be higher than the EU Directive baselines ('gold-plating', which some other Member States are already prepared to do).

3.1 Welfare standards and costs

It is increasingly clear that UK (and EU) animal farming cannot compete on grounds of low price alone in the global market and that a shift to premium products is an economically sound strategy for FAWC to promote in the long term.

To take the example of battery cages for laying hens, Agra CEAS Consulting in a report for the European Commission showed in 2004 that variable (mainly feed) costs for egg production in battery cages were one-third greater in the EU15 than in the USA, Brazil, Mexico, Ukraine and India.⁷ High welfare standards in Europe will also have a positive effect internationally in the longer term. The fact that Europe is likely to require certain welfare standards for imported animal products is one of the drivers behind the current increased interest in farmed animal welfare in China.

There is likely to be some cost, in most but not all cases, in changing to higher welfare systems. (Equally, there may even be gains in terms of longevity and reduced veterinary and housing costs.) But the cost, for producers and for consumers, can often be exaggerated by the farming industry and we would like to see FAWC challenging exaggerated cost estimates or scare stories. According to independent research for the

RSPCA,⁸ the additional cost of producing eggs from new free-range systems rather than from new battery cages would be in the range 2.0 – 2.5 p per egg (much less than some industry estimates), a price most consumers would be well able to afford. Production in new barn systems rather than in new battery cages would add much less, between 0.3p and 1.4p per egg.⁸ In Switzerland, the promotion of non-cage eggs by the two dominant supermarket chains together with government subsidies for alternative systems resulted in consumers being willing to pay more for non-cage shell eggs (although imports of egg products, probably from cage systems, had increased by 2003, showing that there is still work to do).⁷

3.1.1 Public opinion and ethical consumerism

We believe that FAWC would have an important element of public opinion on its side in promoting high welfare standards in food production over the next 20 years. As noted by FAWC¹, the 2005 Eurobarometer survey found that 67% of UK citizens believed that farmed animal welfare was poor or very poor, 78% believed that more needed to be done to improve farmed animal welfare and 85% would have liked to see food products labelled more clearly as to animal welfare conditions of production.

Ethical consumerism is a growing trend. In a Mintel survey, 56% of British adults agreed with the statement, 'We are all responsible for what we choose to buy'.⁹ According to Mintel, 40% of British shoppers claim that they buy free-range products 'whenever they can'.⁹ At the higher premium end, a Key Note market assessment in 2006 predicted a 19.6% growth in the UK market for organic food and drink between 2006 and 2009, with dairy products and eggs having a 24% share and meat and fish a 9.5% share of the total organic sales. In December 2005 36% of respondents claimed to buy organic meat products occasionally or regularly, and 42% claimed to buy organic dairy and egg products occasionally or regularly.¹⁰

Ethical consumerism, however, requires the public to be well-informed and FAWC expert opinion could be channelled towards education, as suggested above and in section 4. A recent opinion survey carried out for Advocates for Animals¹¹ on the subject of farmed animal mutilations showed that almost two-thirds of the people surveyed were unaware of the extent of mutilations; however almost two-thirds said they would rather eat meat sourced from animals that were not mutilated.

3.1.2 Cheap food policy, diet and health

We would like to see FAWC emphasise the benefits to public health to be gained from higher welfare animal farming. The health and welfare of farmed animals and the health and welfare of the people that consume them are intrinsically connected. Proponents of a cheap food policy point to the advantages for low-income consumers of cheap meat, milk and eggs. As FAWC has previously noted, a cheap food policy is associated both with the current low profitability of farming and the low value of individual animals (a margin of a few pence per broiler chicken, for example) and both

are detrimental to animal welfare. It has been pointed out that milk is now cheaper than bottled water, at a time when the average intensively farmed dairy cow survives for only around 3.5 lactations.

We believe that governments have a responsibility to reduce the current over-consumption of cheap animal products which are so frequently poor in animal welfare terms as well as in eating quality, and that FAWC should have a role in that dynamic – it may well be that, in 20 years' time, these issues will routinely be considered together. It should therefore be part of FAWC strategy to challenge the cheap food policy on grounds of human as well as animal health and welfare.

The cheap food policy is associated with a global health problem of obesity and excess weight, leading to a rapid growth in chronic disease.¹² According to the WHO anti-obesity Charter, half of all adults and 1 in 5 children in the WHO European region are overweight or obese.¹³ While this is also due to inactivity, over-consumption of sugars and under-consumption of vegetables and fruit, the over-consumption of animal products encouraged by low cost is an important factor in bad diets.

This connection between over-cheap animal products and bad diet has been recognised in new dietary guidelines for schools that replace 'turkey twizzlers' and burgers, while the increasing interest in 'real food cooking' is exemplified by *River Cottage* and other popular TV series which criticise intensive animal farming. Around 50% of shell eggs sold at retail level in the UK (and also in the Netherlands, Sweden and Denmark) are now from non-cage systems.⁷ An important section of public and political opinion would therefore support FAWC in advocating the production and consumption of fewer, but higher quality, animal food products.

A reduction in animal production would, self-evidently, lead to a reduction in the number of animals farmed for meat, eggs and dairy products, and many would see this as a measurable animal welfare benefit.

3.1.3 Environment and sustainability

We would like to see FAWC emphasise the benefits to the environment and biodiversity of less intensive and higher welfare animal farming. It is well documented that intensive animal farming is associated with overuse of antibiotics, pesticides and fertilisers for feed production, leading to drug resistance,¹⁴ pollution, high energy and water use,¹⁵ overgrazing and reduction in biodiversity. The current concern about climate change, reflected in the FAO's recent critical report *Livestock's Long Shadow*,¹⁵ also provides an opportunity for FAWC to include animal farming in the debate.

'Sustainability' is nominally a goal of UK food and rural development policy and is also taught as part of the school curriculum. However, farmed animal welfare is often not included in this concept. Modern UK farming makes use of animals that are themselves not sustainable in terms of health, welfare or the market, because of excessive selective

breeding (broiler chickens, dairy cows, male chicks of laying breeds, male calves of dairy breeds). We would like FAWC to include farmed animal welfare in discussions of sustainability and to point out that farming systems that claim to be 'sustainable' should also be sustainable in terms of the animals used in them.

In terms of public support for high welfare, it is essential that children should continue to learn about the global context of animal production and consumption in the UK; for example that 80 per cent of the world's soya production is grown as feed for the livestock industry, that demand for soya animal feed from European agribusiness is driving the expansion of the agricultural frontier into the Amazon rainforest, that rainforest is being cleared to graze cattle for human consumption, and wasting vast amounts of energy and water. Greater public awareness of sustainability issues would, we hope, foster support for the farming of fewer animals, to higher welfare standards.

A report in *Nature* magazine¹⁶ revealed that 40% of the Amazon will be lost by 2050 if current trends in agricultural expansion continue, threatening bio-diversity and massively contributing to climate change.¹⁶ Up to 50 percent of the world's plant harvest is currently fed to farmed animals. The UN World Food Council has estimated that transferring 10% - 15% of cereals fed to livestock would be enough to feed the current world population.^{15, 17}

3.2 Methods of achieving high welfare standards

3.2.1 Legislation

We believe that robust legislation to protect farmed animals (to end the use of crates, stalls and battery cages, and to reform broiler production and limit live animal transport, for example) has been and will remain essential. There will always be a requirement to provide sanctions for producers who will not meet modern standards of animal welfare.

3.2.2 Labelling

We agree with FAWC⁴ that accurate and clear welfare labelling of all animal food products sold, which would need to include both food produced locally and imported, could be an effective method of raising welfare standards. FAWC could take a lead in advocating an EU-wide labelling system, to include non-EU imports. It is encouraging that DEFRA also appears to be in support of labelling as a mechanism to increase public understanding and to raise standards.¹⁸

3.3 Scientific assessment of welfare

3.3.1 The need for animal welfare auditing

We believe that all farms, dealers, markets, transporters and abattoirs should be subject to animal welfare assessment and that FAWC should make the achievement of this goal part of its 20-year strategy. This assessment could be achieved either through credible assurance schemes (either voluntary or compulsory), welfare labelling schemes (either

voluntary or compulsory), or compulsory licensing schemes. Any such scheme must be adequately resourced and have sanctions.

Advocates for Animals believes that it is an anomaly that commercial farming is not required to be licensed on the basis of accredited training and inspection for compliance with health and safety, animal welfare and environmental protection standards. Most other commercial enterprises that use animals require to be licensed. One result of this is that a person with no animal welfare knowledge can acquire livestock for farming. Another is that statistics on prevalence of disease and other welfare problems, as well as the prevalence of different husbandry practices, are not systematically collected, and in some cases are unknown or only known anecdotally. A licensing and inspection system would provide FAWC with valuable additional data on animal health and welfare, which could help to make the case for the need to improve welfare, and could also be communicated to the public.

3.3.2 Methods of assessment

The science of animal welfare assessment is now a major topic of research and practice^{19, 20} and it would be feasible to apply it systematically to audit welfare in all farmed animal-related enterprises. Assessment can be based on physiological parameters,²¹ output parameters that can be used as welfare indicators, such as lameness,²² and observation of behaviour.^{23, 24} We agree with FAWC that the ultimate goal of research in this area should be 'a set of standardised and validated measures that can be used by producers to improve the welfare of their stock and by assessors to externally audit on-farm welfare',¹⁹ although we believe FAWC should press for auditing of all animal-related enterprises, including transport, markets and slaughter facilities.

3.3.3. Farm assurance schemes

Some of the most visible voluntary assurance schemes in practice assure little more than compliance with basic legal requirements, as noted by FAWC.¹⁹ We agree with FAWC that assurance schemes have been useful in raising the issue of welfare, but we would like to see FAWC providing easily comprehensible public updates on assurance schemes annually. (For example, Compassion in World Farming's supermarket league table guides have been voluntarily distributed by one of the major supermarket chains.)

3.3.4 Fiscal measures to encourage high welfare

We are much more optimistic than FAWC¹⁹ that a sizeable section of the public can be encouraged to buy on the basis of welfare labelling over the next 20 years (see 3.1.1 above). The big consumer-driven shift towards free-range eggs in supermarkets shows what can be achieved voluntarily. Given that we are a wealthy society, and that society is willing to pay collectively for other agreed social goods, fiscal measures such as differential taxes could also be used to encourage the choice of high welfare products and to help low-income consumers who often wish to do the same.

3.4 International welfare standards

The development of international standards and legislation, as discussed in the FAWC 2006-2010 strategy ¹ will be crucial for improving welfare in a globalised agricultural system. We would like to see FAWC involved as much as possible in these developments. In addition to the OIE standards, the International Finance Corporation (the private investment arm of the World Bank group), which invests in pig and poultry production in developing countries, has recently published a Good Practice Note on farmed animal welfare that states:

'Farm animals can feel, experience and suffer. Animal sentience is already recognised by European Union law and forms the basis of many standards of animal welfare around the world....Higher animal welfare standards are also increasingly seen to be a prerequisite to enhancing business efficiency and profitability, satisfying international markets, and meeting consumer expectations.'²⁵

4. Education

We believe that education should be an important part of FAWC strategy for the next 20 years.

It is a commonplace that many people have lost touch with animal farming to the extent that they are unable to associate a wrapped piece of meat or a pack of milk with a live animal on farm and have little knowledge of farming methods. Education in this area could be crucial to increasing public support for higher welfare systems.

As mentioned above, we would like to see FAWC providing more public information, including:

- Readable versions of subject reports
- Updates on and analysis of assurance and labelling schemes
- Updates on implementation of FAWC recommendations
- General leaflets on animal farming systems, with illustrations

Within the official education system, FAWC could press for more information and discussion about welfare in animal farming to be included in school and college courses and examinations. This could be incorporated within humane education, which Advocates believes should be on school curricula, and incorporating animal welfare.

FAWC could produce educational materials and/or videos/DVDs or PowerPoint presentations for use in schools and colleges. These could be used for example in the context of the Year of Food and Farming programme for schools, supported by DEFRA, the Department for Education and Skills and the Department of Health, due to start from September 2007. ²⁶

5. Long-term goals

We see the major long-term issues that FAWC faces as:

5.1 General issues relating to improvements in welfare:

- Inadequate public information and public understanding
- Inadequate legal protection of farm animals
- Inadequate licensing, auditing, inspection and enforcement
- International trade issues, including imports from countries with lower welfare standards

5.2 Priority welfare issues in UK farming:

- Excessive selective breeding
- Caged or overcrowded laying hens
- Meat chicken and turkey breeding and rearing systems
- Pig breeding (farrowing crates) and fattening systems
- Intensification of dairy farming
- Live export of calves and sheep
- Use of painful mutilations
- Suffering during transport
- Suffering at slaughter
- Treatment of by-product and low-value cull animals
- Too few people looking after too many animals

5.3 Priority long-term goals with possible time-scales:

We suggest that the most urgent animal welfare goals that should be achieved over the 20 year time-scale are:

- Phase-out of all cage systems for laying hens (3 - 5 years)
- Legislative reform of broiler chicken and turkey production, including breeding (5 years)
- Incentives for major growth of free-range meat chicken production using suitable slower-growing breeds (5–10 years)
- Phase-out of farrowing crate or other confinement systems (5 years)
- Legal requirement for pain relief during and following painful husbandry procedures (2 years)
- Reversal of over-specialised selective breeding (10 years)
- Incentives for major growth in use of dual-purpose chickens and cattle (10 years)
- Phase out of fully slatted systems for fattening pigs and provision of straw or other litter (5 years)

Advocates for Animals. Consultation on FAWC's 20 year strategy.

- Incentives for major growth of free-range pig rearing and fattening systems (5–10 years)
- End to long-distance transport for slaughter (10 years)
- Accreditation, licensing and inspection of all farm animal related enterprises (10 years)
- Educational, technical and regulatory assistance for rapidly industrialising countries (5–15 years)
- Adoption of effective international animal welfare standards (10–15 years)

References

1. FAWC. *Strategic Plan 2006-2010*. 2006
 2. DEFRA. *Government response to the FAWC report on the welfare implications of animal breeding and breeding technologies in commercial agriculture*. Consultation document. November 2006 (<http://www.defra.gov.uk/corporate/consult/fawc-breeding/consultation.pdf>)
 3. For example, D DeGrazia. *Taking animals seriously: mental life and moral status*. Cambridge University Press, 1996.
 4. FAWC. *Report on Welfare Labelling*. June 2006
 5. B Mepham. *Bioethics: an introduction for the biosciences*. Oxford University Press, 2005.
 6. FAWC. *A long term strategy for farm animal welfare in Great Britain – ethical principles & welfare assessment, surveillance and standards*. Consultation letter, 25 September 2006.
 7. Agra CEAS Consulting. *Study on the socio-economic implications of the various systems to keep laying hens*. Report for the European Commission. DG SANCO. December 2004.
 8. RSPCA. *The Case Against Cages. Evidence in favour of alternative systems for laying hens*. 2005.
 9. MINTEL. *Attitudes towards ethical foods*. Press release, August 2006. Available at reports.mintel.com
 10. Key Note. *Organic Foods. Market Assessment*. 2006
 11. TNS System 3 opinion poll, October 2006, commissioned by Advocates for Animals.
 12. T Lang. Achieving access to ethical food: animal and human health come together. *Animals, Ethics and Trade*, ed. J Turner and J D'Silva. Earthscan 2006. Chapter 24.
 13. WHO European Ministerial Conference on Counteracting Obesity. *Draft European Charter on counteracting obesity*. 18th September 2006.
 14. K M Shea. Antibiotic resistance: what is the impact of agricultural uses of antibiotics on children's health? *Pediatrics* **112**:253-258, 2003 Available at <http://pediatrics.aappublications.org/cgi/content/full/112/1/S1/253>
 15. H Steinfeld et al. *Livestock's Long Shadow: environmental issues and options*. FAO, November 2006 http://www.virtualcentre.org/en/library/key_pub/longshad/A0701E00.htm
 16. Soares-Filho, B.S. et al., 2006. Modelling conservation in the Amazon basin. *Nature* 440:520-523. Published 23rd March 2006.
 17. Robert Goodland, *Livestock sector environmental assessment*, in *Sustainability in agriculture: agriculture at the crossroads between ecology, economics and social science*. M. Hardtlein, M. Kaltschmitt, M. Lewandowski and H Wurl (eds.) German Federal Environment Foundation Press, Berlin, 1999.
 18. Defra. *Delivering good animal welfare*. A draft delivery strategy under the Animal Health and Welfare Strategy. November 2006
 19. FAWC. *Report on the Welfare Implications of Farm Assurance Schemes*. June 2005.
 20. A J F Webster and D C J Main, eds. Proceedings of the 2nd International Workshop on the Assessment of Animal Welfare at Farm and Group Level. *Animal Welfare* 14(4): 429-712. 2004
 21. Report of the Scientific Committee on Animal Health and Animal Welfare. *The Welfare of Animals during Transport*. Section 2. European Commission, 2002.
 22. H R Whay et al. Assessment of dairy cattle welfare using animal-based measurements. *Veterinary Record* 153:197-202. 2003
 23. D M Weary et al. Identifying and preventing pain in animals. *Applied Animal Behaviour Science* 100(102):64-76. 2006
 24. F Wemelsfelder and M Farish. Qualitative categories for the interpretation of sheep welfare: a review. *Animal Welfare* 13(3):261-268. 2004
 25. International Finance Corporation. Good Practice Note. Number 6. October 2006. *Animal Welfare in Livestock Operations*.
- Defra. Plans for year of food and farming in schools revealed. News release 512/06. 29 November 2006. www.defra.gov.uk/news/2006/061129b.htm