

Standards Consultation Feedback Pro Forma – February 2011

Name: Libby Anderson

Organisation: OneKind

email: policy@onekind.org

THIS SUBMISSION FROM ONEKIND REPEATS THE COMMENTS MADE BY COMPASSION IN WORLD FARMING (CIWF), WITH WHICH WE ARE IN FULL AGREEMENT AND WISH TO BE ASSOCIATED.

Please indicate the sector to which your response relates: **1. Pig Standards**

Please email to afsconsultation@assuredfoodstandards.com or post it back to Anita Roberts, AFS, Kings Building, Smith Square, London SW1P 3JJ by the 25th March 2011.

Std Ref No.	Current wording (If a change is proposed to only part of the wording quote only the relevant sentence(s))	Proposed rewording	Rationale for the change
AH 4.2	As a routine, no litters should be weaned at less than 21 days	<u>No</u> litter should be weaned at less than 21 days.	'As a routine' tends NOT to limit a procedure. We therefore suggest stronger wording, in line with your first proviso – unless the welfare of the dam or piglets would otherwise be adversely affected.
AH.8	<i>In some situations legislation requires that those killing farm animals using a captive bolt have a slaughterman's licence (the exceptions are when animals are killed in an emergency or for home consumption. An animal whose life may be considered to be "not worth living" may be regarded as an emergency. An animal which is not fit for travel but is not overtly suffering may not be considered an emergency e.g. large ruptures, deformities.</i>	In some situations legislation requires(the exceptions are when animals are killed in an emergency or for home consumption). An animal <u>who is suffering</u> may be regarded as an emergency. An animal which is not fit for travel but is not overtly suffering may not be considered an emergency e.g. large ruptures, deformities, <u>and therefore may not be killed without a slaughterman's licence.</u>	Needs clarity of statement A life 'not worth living' is often used in relation to animals that have no commercial outlet (e.g. the male dairy calf); the decision to cull an animal should be based on suffering.

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<p>AM.1. K</p>	<p>Regulations prohibit routine tail docking and teeth clipping of pigs. The Producer may only conduct these operations following formal confirmation within the VHP that the practices are necessary and acceptable within the regulations and only on animals up to 72 hours old. The necessity for these practices must be reviewed and reported in the QVR. The Regulations do permit tail docking and teeth clipping where there is evidence on the farm that injuries have occurred to pigs as a result of not docking or clipping.</p>	<p><u>Tail-docking and teeth-clipping or grinding of pigs must not be carried out routinely.</u></p> <p><u>Producers may only conduct these operations as ‘a last resort’: when improvements to the pigs’ environment and management have proved ineffectual, and should be carried out under formal confirmation within the VHP, and only on animals less than 72 hours old.</u></p> <p><u>Producers must take measures to improve environmental conditions or management systems to reduce the risk and incidence of tail biting and injury to sow teats.</u></p> <p><u>The necessity for these practices must be reviewed and reported in the QVR, and there should be a planned programme to remove the need for tail-docking and teeth-clipping / grinding.</u></p>	<p>This gives an incomplete, and hence inaccurate, account of the law. The Mutilations (Permitted Procedures) (England) Regulations 2007 stipulate that tail docking “<i>may only be carried out where measures to improve environmental conditions or management systems have first been taken to prevent tail-biting, but there is still evidence to show that injury to pigs’ tails by biting has occurred</i>”.</p> <p>Council Directive 2008/120/EC also states that “...inadequate environmental conditions or management systems must be changed.”</p> <p>Defra’s Pig Welfare Code helpfully explains this by saying “<i>Tail docking should only be used as a last resort, after improvements to the pigs’ environment and management have proved ineffectual.</i>” The Red Tractor scheme should not be less demanding than the Defra Code.</p> <p>In light of the above, the Red Tractor (RT) standards should make it clear that before carrying out tail docking, farmers must first try to prevent tail biting by improving environmental conditions or management systems. Only if these attempts prove ineffectual may they tail dock. Moreover, the obligation to try and prevent tail biting by methods other than tail docking is a continuing one. After a batch of pigs has been tail docked, farmers must re-new their attempt to prevent tail biting by improving environmental conditions or management systems.</p> <p>The RT standards should also make it clear that by law teeth clipping and grinding may not be carried out routinely but only after other measures to</p>
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			<p>improve environmental conditions or management systems have been taken in order to prevent injuries to sows' teats. The Defra Code interprets the law clearly by saying that teeth clipping and grinding may only be carried out "as a last resort".</p>
<p>AM.1. 3.K</p>	<p>Producers must ensure that:</p> <p>a. docked tails are of a uniform length, b. tails are left long enough to cover the equivalent of the vulva and anus once the pig reaches slaughter weight c. clipped or ground teeth are smooth, without sharp edges d. the same piece of equipment is not used for both teeth clipping and tail docking.</p> <p>The equipment used for tooth clipping and tail docking shall be sufficiently sharp to allow clipping or docking at the first attempt and shall be kept in good working order, clean and clearly identified as to its use.</p>	<p><u>Where tail-docking and tooth reduction are conducted,</u> producers must ensure that:</p> <p>c. clipped or ground teeth are smooth, without sharp edges <u>and are minimally blunted without exposing the pulp cavity.</u></p> <p><u>e. Appropriate training is given for all practices.</u></p> <p><u>There should be a planned programme to remove the need for tail-docking and teeth-clipping / grinding.</u></p>	<p>Tooth clipping is prohibited in many key pig producing countries including the Netherlands, Denmark and Germany. It is also banned in Sweden and Austria. This is to reduce the risk of tooth splintering and infection. Tooth grinding or filing is used instead to reduce these risks. It is also likely to be easier to leave a smooth surface on a minimally blunted tooth if it filed or ground rather than clipped.</p> <p>According to FAWC, "If performed by unskilled operators or with poor equipment, splintering of the tooth and damage to the gum can occur, with chronic pain and risk of infection. Tooth grinding uses abrasion to remove the sharp point of the tooth. The risk of splintering is reduced".</p> <p>We also agree with FAWC's recommendation that "Tooth reduction in pigs should be permitted only after a risk assessment, and involve minimal blunting with suitable equipment done by competent staff".</p> <p>The FAWC report refers to concern about heat generation during the grinding process. This suggests that operators are trying to remove too much of the tooth. Indeed, FAWC goes on to suggest that this is a problem if grinding continues beyond the recommended period of 1-2 seconds.</p>

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			<p>Our own observation of grinding in the Netherlands was that the process took significantly less than one second per tooth or pair of teeth.</p> <p>In particular we would argue that any tooth reduction should avoid opening the pulp cavity for two reasons. The pulp cavity contains nerves; breaching it increases the risk of pain. Secondly, the pulp cavity contains blood vessels increasing the risk of any infection reaching the bloodstream. This risk can be mitigated but not avoided however careful and skilful the operator.</p>
HF.4.5			<p>Fully-slatted systems should not be permitted as the use of such floors makes it very difficult, perhaps impossible, for farmers to comply with the legal requirement to provide enrichment materials that enable “proper investigation and manipulation activities”.</p> <p>Systems which do not permit the placement on the floor of manipulable materials such as straw should not be built.</p>
FW.1.1	<p>It is required that access to supplementary or alternative high fibre is provided in such systems.</p>	<p><u>A source of high fibre feed should be available to dry sows at all times. Bedding (such as straw) should be provided for all sows.</u></p>	

Our additional recommendations for improvement of the AFS Pig Standards are as follows:

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- Provision of nesting material for all sows
- A phased programme to require free-farrowing for indoor systems
- Increased space allowances for all pigs

Consideration should be given to a non-staggered space allowance (by weight) and the empirical constant $k=0.047$ (required for lateral recumbancy) in the equation $A=kW^{0.67}$, where A is m^2/pig and W is liveweight. Space is currently staggered and derived from the equation with an empirical constant of 0.037 (required for sternal recumbancy).

- Phased programme for the removal of fully-slatted systems and provision of proper enrichment materials (i.e. complex natural materials)
- Prohibit the use of genetically modified or cloned animals and their offspring
- Strengthen the requirements for on-farm monitoring of animal health and welfare by producers, including species specific targets for key welfare indicators
- Restriction and monitoring of transport duration to eight hours (including loading / unloading)
- Prohibit the live export of young animals and animals for slaughter
- Require that the breed and genetics used have been selected for production traits that are in line with the production of a robust animal that is fit for purpose and able to maintain high health and welfare outcomes. A positive example is breeding for maternal behaviour. Negative examples are breeding for high litter size (high litter sizes are associated with higher pre-weaning losses and increased piglet aggression for milk), and high growth rate (associated with lameness / cardio-vascular problems in finishing pigs).
- Develop a system for monitoring, setting progressive targets and improving welfare outcomes through the assurance scheme



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Please indicate the sector to which your response relates: **2. Broiler Standards**

No comments on suggested amendments.

It is difficult to see detail of the implementation of the new GB requirements for stocking above 33kg/m² up to 38kg/m² (FPD, PMI and mortality trigger levels).

Our additional recommendations for improvement of the AFS Broiler Standards are as follows:

- Further increasing space allowance
- Providing specific detail for environmental enrichment (natural light, straw (or equivalent) bales, perches)
- Monitoring the walking ability of chickens on-farm and setting trigger levels for investigation in poor flocks
- Require that the breed and genetics used have been selected for production traits that are in line with the production of a robust animal that is fit for purpose and able to maintain high health and welfare outcomes. For example high growth rate in the modern broiler and its link with poor walking / inactivity / ascities / cardiovascular problems.
- Develop a system for monitoring, setting progressive targets and improving welfare outcomes through the assurance scheme

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Please indicate the sector to which your response relates: **3. Dairy Standards**

Std Ref No.	Current wording (If a change is proposed to only part of the wording quote only the relevant sentence(s))	Proposed rewording	Rationale for the change
M.T.1	<i>It is recommended that tanks are fitted with a temperature logger so that the initial rate of cooling and maintenance of this lower temperature can monitored and reviewed. It is likely that this will become scheme requirement for new tanks from April 2013, and for older tanks to be retro-fitted sometime thereafter.</i>	<i>It is recommended that tanks are fitted with a temperature logger so that the initial rate of cooling and maintenance of this lower temperature can be monitored and reviewed. It is likely that this will become a scheme requirement for new tanks from April 2013, and for older tanks to be retro-fitted sometime thereafter.</i>	
MT. 5 R	It is recommended the all bulk tanks (including external silos) are serviced at least one per year to ensure effective cooling and washing functions.	It is recommended the all bulk tanks (including external silos) are serviced at least one once per year to ensure effective cooling and washing functions.	

Our additional recommendations for improvement of the AFS Dairy Standards are as follows:

- Prohibit tethering
- Prohibit zero-grazing systems for dairy cows



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- Prohibit the use of genetically modified or cloned animals and their offspring
- Strengthen the requirements for on-farm monitoring of animal health and welfare by producers, including species-specific targets for key welfare indicators
- Restrict of transport duration to eight hours (including loading / unloading)
- Prohibit the live export of young animals and animals for slaughter
- Require that the breed and genetics used have been selected for production traits that are in line with the production of a robust animal that is fit for purpose and able to maintain high health and welfare outcomes. For example, high milk yield and its link with lameness, mastitis, metabolic disorders, infertility and reduced longevity in the dairy cow, as well as high yielding breeds associated with reduced conformation in the male dairy calf.
- Develop a system for monitoring, setting progressive targets and improving welfare outcomes through the assurance scheme

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Please indicate the sector to which your response relates: **4. Beef and Lamb Standards**

Std Ref No.	Current wording (If a change is proposed to only part of the wording quote only the relevant sentence(s))	Proposed rewording	Rationale for the change
HF.4	Safe , suitable bedding must be provided. Where slats are used, the design must not cause animals to slip or cause foot injuries. Fully-slatted floors must not be used for breeding cows or replacement heifers.	Safe, suitable bedding must be provided. Where <u>part</u> -slats are used, the design must not cause animals to slip or cause foot injuries. Fully-slatted floors must not be used for <u>any category of</u> cattle and sheep.	There is an inconsistency in this standard between the admirable requirement for safe, suitable bedding to be provided and the use of fully-slatted floors for categories of cattle other than breeding cows or replacement heifers, and all categories of sheep. Fully-slatted flooring should not be permissible and safe suitable bedding should be provided for all livestock when housed.

Our additional recommendations for improvement of the AFS Beef and Lamb Standards are as follows:

- Prohibit tethering
- Prohibit zero-grazing systems for dairy cattle, beef cattle and sheep (with an exception for dairy beef if necessary to ensure that these animals are not likely to be shot at birth)
- Introduction of a requirement to use anaesthetic for disbudding of calves, tail docking of lambs and castration of calves and lambs;
- Later weaning ages (minimum of at least seven weeks for lambs and eight weeks for calves);
- Prohibit the use of genetically modified or cloned animals and their offspring;
- Strengthen the requirements for on-farm monitoring of animal health and welfare by producers, including species specific targets for key welfare indicators



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- Restrict transport duration to eight hours (including loading / unloading)
- Prohibit the live export of young animals and animals for slaughter
- Require that the breed and genetics used have been selected for production traits that are in line with the production of a robust animal that is fit for purpose and able to maintain high health and welfare outcomes.
- Develop a system for monitoring, setting progressive targets and improving welfare outcomes through the assurance scheme