

# **SUSTAIN RESPONSE TO THE CONSULTATION DOCUMENT ON AN ANIMAL HEALTH AND WELFARE STRATEGY FOR GREAT BRITAIN**

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## **THE STATUS OF THIS RESPONSE**

Sustain: The alliance for better food and farming advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the living and working environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level (listed on the back page of *Digest*, our quarterly newsletter, enclosed with the hard copy).

Many of the proposals in this submission have already been published, in one form or another, individually or collectively by organisations in our membership. However, it has been agreed that Sustain should prepare a response to the consultation that would integrate these proposals into a single document, and add new or updated suggestions as appropriate: hence this paper.

A process of obtaining contributions and endorsements from Sustain's membership has been undertaken and, at the end of the document, is a list of those who wish, explicitly, to endorse the document's main principles.

## **ANSWERS TO THE "QUESTIONS TO CONSIDER"**

### **1. DO YOU AGREE THAT WE NEED A MORE STRATEGIC APPROACH TO ANIMAL HEALTH AND WELFARE IN GREAT BRITAIN? IF SO, WHAT DO YOU THINK A STRATEGY SHOULD COVER? DO YOU HAVE ANY OTHER VIEWS ON THE REASONS FOR A STRATEGY?**

Sustain agrees that an animal health and welfare strategy is needed. Poor farmed animal welfare standards are due largely to: the failure of intensive systems to respect natural behaviour patterns; overstocking; mixing animals of the same species from different groups; and too long and too frequent transportation of live animals. These factors, coupled with a shrinking genetic pool of farmed livestock, has both increased animals' susceptibility to disease (and people's exposure to those that are zoonotic), and has encouraged the rapid spread of diseases such as BSE, foot and mouth disease, and swine fever<sup>1</sup>.

The Food Standards Agency's most recent survey<sup>2</sup> confirmed widespread and persistent public concern for the welfare of farmed animals. Almost three-quarters (73%) of respondents said their eating habits are affected by their concern for the conditions in which food animals are raised. This concern translates into purchasing patterns. For example the market for organic meat and animal products continues to

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<sup>1</sup> For further details, particularly of the damage to animal health and welfare of intensive farming systems, see the response to this consultation by Compassion in World Farming

<sup>2</sup> Consumer Attitudes to Food Standards, Wave 3, UK Report, by Taylor Nelson Sofres for the Food Standards Agency and COI Communications, February 2003

rise, despite higher prices, reflecting the higher welfare standards in organic systems. The percentage of shelf space devoted to free range eggs is also increasing.

Our views on what the strategy should cover, and the reasons for this, are included in the answers to the questions below.

**2. IS THE DRAFT VISION SET OUT (IN THE CONSULTATION DOCUMENT) A DESIRABLE FUTURE FOR ANIMAL HEALTH AND WELFARE IN BRITAIN? WHAT IS YOUR VISION?**

The following section proposes changes to the draft vision which, for clarity, is duplicated in italics. The additions are highlighted in bold, followed by a rationale for each change.

*“...in 10 years time we want to have achieved:*

*Consistently high standards of animal health and welfare*

- *Healthy and protected animals – on the farm, in the wild and in the home*
- *Animal welfare practices enhanced and promoted **ADD including promoted to the public, as well as to animal keepers***

Rationale: Government, together with the private and voluntary sectors, should give the public more information about how farm animals are kept and the damage to animals’ health and welfare of intensive farming practices. Given already high levels of consumer concern (see above) it seems likely that, if more details about the animal health and welfare implications of intensive farming were widely available, a much larger proportion of the public would be willing to pay the relatively small extra sums needed (see below) to buy produce derived from animals reared humanely. Labelling is one way that such information could be promoted, but see our comments below on the need for changes to the operation of and standards for current assurance labelling schemes.

- *“Disease free” status against highly infectious diseases and the restoration of the UK’s international animal health position **ADD while enhancing the ability of farmed animals to resist common infections***

Rationale: While the DEFRA document is probably referring to “disease-free” in the legal, trade-related sense of the term, we consider that establishing a truly disease-free population creates highly vulnerable animal groups and, as a result, biosecurity has to be 100% for these herds to remain pathogen free. However, achieving 100% biosecurity is extremely difficult - arguably impossible - to attain. Implementing monitoring systems, including restoring the numbers of farm animal vets (and the skills to recognise some types of diseases, particularly rare and/or exotic diseases) will be expensive and will take time. Similarly, import controls continue to be difficult to enforce, and animal movement controls are being resisted by some (though not all) parts of the livestock industry.

Instead of aiming to eradicate all pathogens from the environment of livestock, policies should enable sufficient exposure to benign and common environmental micro-organisms – in a context of high animal welfare standards - in order to encourage a robust immune system and promote animals’ natural resistance to

infection. In short, the strategy should focus not merely on the absence of disease but on promoting policies that result in healthy animals<sup>3</sup>.

- *Adaptability and understanding of the changing environment and the threats this can impose on animal health and welfare*
- *Animal owners and Government to each take an appropriate level of responsibility for animal health*
- *The right balance between the partners in animal health and welfare as to how the costs are met **ADD, acknowledging that, ultimately, citizens will bear the costs (through prices and/or taxation) and that welfare measures are only one (and often a minor) aspect of the costs of animal farming***

Rationale: It is widely assumed that changing from intensive farming to more humane systems will involve much higher production costs for farmers, and a significant increase in retail food prices for consumers. This assumption is misleading and is not borne out by the industry's own economic data.

Changing to a higher welfare system often adds surprisingly little to on-farm production costs (see box below). Indeed, improved welfare often leads to healthier animals and so, in some cases, to lower costs (reduced expenditure on veterinary medicines and some housing systems, and lower mortality rates) and higher productivity in terms of improved growth rates and better feed conversion ratios.

National Farmers Union figures show that a free-range egg costs just 1.54p more to produce than a battery egg, whereas a barn egg costs just 0.71p more to produce than a battery egg. UK consumers eat 180 eggs per person per year, including the eggs used in processed foods, etc.<sup>4</sup> On this basis, and provided that retailers charged no more than is needed to cover additional production costs, it has been calculated that the UK could change from battery to free-range eggs for just £2.77 per person per year (or £1.27 to change from battery to barn eggs).

For pigs, figures from France (Institut Technique du Porc), the Netherlands (Rosmalen Institute) and the UK (Meat and Livestock Commission) all show that even in the better group housing systems – ones giving reasonable space and ample straw – a kilo of pigmeat costs less than 2 pence extra to produce than in sow stalls.

Moreover, non-welfare factors can have a greater impact on on-farm production costs than welfare. The MLC reported in 1999 that the cost of feed varied between the major pig producing countries of Europe by 14 pence per kilo of pig produced, and the environmental costs varied by 8 pence per kilo.

Figures provided by Compassion in World Farming

Not only are welfare costs only one contributor to overall on-farm production costs, but overall costs are themselves only one element in retail pricing, which includes distribution and marketing costs. Accordingly, any increase in on-farm production

<sup>3</sup> For a detailed exploration of the concept of positive animal health, please see the submission by the Soil Association to the Royal Society Inquiry into Infectious Diseases in Livestock, January 2002. Soil Association: Bristol

<sup>4</sup> Poultry World, September 2002

costs arising from higher welfare standards will have a proportionately smaller impact on retail prices.

- *An active role in shaping and leading EU and international agendas on animal health and welfare* **ADD, in particular ensuring that the World Trade Organisation's rules promote, rather than undermine, high animal welfare standards.**

Rationale: Under the World Trade Organisation (WTO) rules, the EU can ban a cruel rearing system in its own territory, but it is generally assumed that it cannot prohibit the import of meat or animal products coming from animals reared in such a system in third countries. This appears to make it difficult for the EU to go ahead with its own improvements, as its farmers risk being undermined by cheaper, low welfare imports.

However, this interpretation of WTO rules can be challenged successfully. Between 1998 and 2001 the WTO rulings on the *shrimp-turtle* case shifted in favour of higher standards to protect wildlife. Both the WTO Panel's and the Appellate Body's statement in the *shrimp-turtle* case in 2001 noted that an importing country may make it a condition of access to its markets that would-be exporting countries adopt a programme of environmental protection that is comparable in effectiveness (but not necessarily the same as) that of the importing country<sup>5</sup>. There is also a reference to 'non-trade measures' in the Doha Ministerial declaration, and "other legitimate factors" in Codex negotiations, which we welcome as a further acknowledgment that such issues are being recognised as legitimate for further negotiation.

There is no reason why this thinking on environmental issues and other "non-trade measures" should not be extended to animal welfare policies. Indeed, the EU has recently decided that it is consistent with the WTO rules for it to ban the testing of cosmetics on animals and also to ban the *sale* of animal-tested cosmetics in the EU, with the sales ban applying to both imported and domestic cosmetics.

However, such steps cannot be taken casually, and should include a process of negotiation. With support from the UK the EU could restrict the import of battery eggs, for instance, when its own prohibition comes into force in 2012, provided it takes the other measures referred to in the Panel's 2001 *shrimp-turtle* ruling, such as providing technology transfer. The EU could, for example, offer to help egg exporting countries with the know-how to operate successful perchery and free-range systems.

#### Other international institutions

The UK should vigorously support the moves towards improving animal welfare standards that are taking place at in international institutions, and encourage the EU to do likewise. The Organisation International des Epizooties, for instance, has decided to incorporate animal welfare into its major functions and to promulgate guidelines, recommendations and standards. The Food and Agriculture Organisation and the World Bank have also recently recognised the importance of animal welfare. In

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<sup>5</sup> See the response to this consultation by Compassion in World Farming

addition, a World Bank policy paper<sup>6</sup> has recognised that intensive livestock production damages poorer countries, and particularly low income groups in poorer countries by, for example:

- Undercutting small-scale farmers (who may be driven out of business and off the land);
- Undermining food security, by diverting land to animal production. A given area of land can feed many more people if it is used to grow cereals for human consumption, than if it grows feed for animals, whose meat is then eaten by people. In addition, a large increase in global feed requirements, arising from a shift to intensive animal production, is likely to increase the price of grain, putting it further out of reach for poorer people.

In addition, many groups are concerned that intensive livestock farming will foster import dependence, since the animal breeds, equipment, veterinary medicines, and feed required for such systems is rarely indigenous in poorer countries. Indeed, the UK and EU should prohibit EU-based companies from selling the technology for intensive farming systems which have been, or are about to be, banned in the EU. This practice is no more defensible than exporting from the EU high tar tobacco which is not permitted to be sold in the EU.

In short, the UK and the EU should use their influence not just with the international bodies referred to above, but also with the governments of poorer countries to support them – for example, via technology transfer and appropriate aid programmes – in using humane, sustainable forms of animal farming and to discourage the adoption of intensive livestock production.

- ***Responsible use of veterinary medicines* ADD including an immediate prohibition on the use of antibiotics as growth promoters in animal production, and phasing out as soon as possible routine prophylactic use of these drugs.**

Rationale: Despite the difficulties inherent in measuring this phenomenon, it is widely agreed that rates of food poisoning have been increasing over a number of years. The most common sources of food-borne infectious organisms capable of affecting human health are animals and their products, since human biology is more similar to animals than to plants. Hence meat and animal products are the most commonly cited source of food poisoning organisms<sup>7</sup>. One estimate suggests animal products may cause as much as 95% of food poisoning cases<sup>8</sup>. Food poisoning hits hardest at those with already weakened immune systems, such as the very young, the elderly and the ill. In some instances food poisoning can be fatal or severely debilitating<sup>9</sup>, as well as

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<sup>6</sup> *Livestock Development: Implications for Rural Poverty, the Environment and Global Food Security*. November 2001. World Bank

<sup>7</sup> Tirado, C and Schmidt, K (2000a) WHO surveillance programme for control of foodborne infections and intoxications: Organization and Management Programme Report, Federal Institute for Consumers Protection and Veterinary Medicine (BgVV): Berlin. Also, (2000b) same authors and series, 7<sup>th</sup> report – 1993-1998.

<sup>8</sup> Professor Richard Lacey, Leeds University cited in Vegetarian Society fact sheet “Health and Vegetarians”

<sup>9</sup> See information leaflet produced by HUSH: The UK E.coli Support Group on the effects of Haemolytic Uraemic Syndrome and Thrombotic Thrombocytopenic Purpura. [www.ecoli-uk.co.uk](http://www.ecoli-uk.co.uk)

unpleasant and causing economic losses<sup>10</sup>. In addition, treating some food poisoning cases is becoming increasingly difficult due to the development of antibiotic resistance. Routine use of antibiotics in intensive animal farming systems is contributing, alongside over-use in human medicine, to this grave, world-wide problem<sup>11 12</sup>.

Experience from Sweden shows that phasing out routine use of antibiotics in farming is entirely feasible<sup>13</sup>. Antibiotics to treat sick animals should be used only under veterinary supervision. This would reduce the incidence of antibiotic resistance in humans and allow some food poisoning cases to be more effectively treated. It would also require much improved animal welfare standards, as an alternative method of preventing illness in livestock. Better management, including reduced stocking rates, mixed cattle and sheep systems, and clean grazing systems (all used in organic systems), could also be used to replace the routine use of veterinary products, including to treat ectoparasites in livestock.

#### *Improved public health*

- *Reduced carriage of food borne pathogens by food producing animals*
- *No major food scares from animal products **ADD including farmed or wild fish products** or any other animal related public health surprises*

Rationale: Controversy remains over residues of polychlorinated biphenyls (PCBs) in farmed fish. This has been linked to the concentration of PCBs in fish feed made from wild fish contaminated with PCBs. The Food Standards Agency (FSA) maintains that PCB residues in farmed salmon remain within safe limits, while some research indicates that some vulnerable consumers (e.g. toddlers or pregnant women) might be at risk if they eat more farmed fish than average<sup>14</sup>.

In contrast, the FSA has recently<sup>15</sup> advised pregnant and breast-feeding women, and women intending to become pregnant, to limit their consumption of tuna to no more than two medium sized cans (or one fresh tuna steak) per week. These women, and children under 16, should avoid eating shark, swordfish and marlin altogether. The advice is intended to protect unborn children, breast-fed babies and children from mercury contamination in certain fish, as this can damage the nervous system.

Shellfish are also sometimes rendered inedible due to toxic residues<sup>16</sup>. One of the major causes of this poisoning is marine eutrophication, which is caused by

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<sup>10</sup> Pretty, J, et al, *An assessment of the total external costs of UK agriculture 2000*. Agricultural Systems, 65(2), 113-136.

<sup>11</sup> Young, R, Craig, A, *Too hard to swallow - the truth about drugs and poultry: The use and misuse of antibiotics in agriculture*. 2001. Soil Association: Bristol

<sup>12</sup> Fookes, C, Dalmeny, K, *Organic food and farming – myth and reality. Organic vs non-organic: the facts*. 2001. Soil Association: Bristol and Sustain: London

<sup>13</sup> *Today we defeat bacteria. What about tomorrow? Documentation from a conference in Brussels, 13 November 1997*. Ministry of Agriculture Food and Fisheries, Sweden: Stockholm

<sup>14</sup> Jacobs, M., Ferrario, J., and Byrne C., 2000. Investigation of PCDFs and selected coplanar PCBs in Scottish Farmed Atlantic Salmon. Pops in Food, vol. 47 pp.338-340.

<sup>15</sup> Agency updates advice to pregnant and breast-feeding women on eating certain fish. Press release, 17 February 2003, Food Standards Agency: London

<sup>16</sup> Peachey, P. 25<sup>th</sup> June 2002. *Tide of misery for UK shellfish trade as health scare and algae blooms hit the industry*. The Independent

compounds of phosphorous and, to a lesser extent, nitrogen present in the water. Some 34% of this phosphorous comes from livestock and 16% from inappropriately used fertiliser<sup>17</sup>.

It is clear that tough measures need to be taken to improve the sustainability of the fish and shellfish industries, not only to avoid risks to human health, but also to improve very low welfare standards<sup>18</sup> and reduce damage to the environment (see below under “Reducing waste”) and protect wild fish stocks<sup>19</sup> and the marine environment. It is less clear what more might be done to reduce mercury contamination in wild fish.

- *Public confidence in the way their food is produced*

#### **ADD**

- **Reduced contribution by livestock farming (including fish) to harmful amounts and types of fat in the diet**

Rationale: The following summarises the evidence on the human health effects of consuming meat and livestock products such as eggs and dairy produce, and also farmed fish. The reasons for doing so are as follows: Increasing demand for meat is one of the factors driving the enlarging scale, intensive nature and higher volume of trading in the livestock industry. If, due to health and other considerations (such as the welfare and environmental concerns outlined in this document), demand for meat and related products falls, this could reduce the pressures on the livestock sector to continue to intensify production and reduce costs in an attempt to compete with cheaper, overseas producers.

There is a strong human health case for discouraging high consumption levels of meat and livestock products, of which the following is merely a brief summary.

#### Cancer

In 1998 the Department of Health published a report<sup>20</sup> on diet and cancer that concluded, *inter alia*, that:

“lower consumption of red and processed meat would probably reduce the risk of colorectal cancer...” and that “...individuals’ consumption of red and processed meat should not rise; that higher consumers should consider a reduction...from around 90g/day cooked weight...”

A similar report<sup>21</sup> was published at the same time by the World Cancer Research Fund, recommending that:

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<sup>17</sup> *Junk food for plants*. 2002. Plantlife: London

<sup>18</sup> The Farm Animal Welfare Council notes that premature death among farmed fish is “higher than that which occurs in other farmed animals”. Report on the Welfare of Farmed Fish, 1996. Farm Animal Welfare Council: Surbiton, Surrey

<sup>19</sup> For a comprehensive analysis see Lymbery, P. *In too deep – the welfare of intensively farmed fish*. Compassion in World Farming Trust, 2002

<sup>20</sup> *Nutritional Aspects of the Development of Cancer. Report of the Working Group on diet and cancer of the Committee on Medical Aspects of Food and Nutrition Policy*. Department of Health 1998 HMSO: London

<sup>21</sup> *Food, Nutrition and the Prevention of Cancer: a global perspective*. 1998, World Cancer Research Fund: London

“If eaten at all, limit intake of red meat to less than 80g daily...”

The publication of both reports was highly controversial, and there were accusations in the media at the time that the government had bowed to meat industry pressure to increase the daily upper limit for meat consumption from 80 to 90 grams. A number of reports before and since have linked meat consumption to a wide range of cancer sites, including breast, pancreas and prostate, but the link to colorectal cancer remains the strongest.

### Cardiovascular diseases (CVDs)

Cardiovascular diseases (CVDs) - coronary heart disease and stroke - remain the main cause of premature death in most wealthy, (post) industrialised countries, but ironically, these diseases of “affluence” are most common among the poorest people, including in rural, food-producing areas<sup>22</sup>, leading to morally unacceptable health inequalities<sup>23</sup>.

The link between meat and related product consumption and CVDs - coronary heart disease and stroke - is less direct than for colorectal and other cancers. While there is a good deal of evidence that vegetarians are less likely to die from CVDs, it is not clear whether this is mainly due to their lower saturated fat intake (meat and dairy products are major sources in the UK diet), or their higher fruit and vegetable intake (and, thereby, higher intakes of protective anti-oxidant vitamins and minerals)<sup>24 25</sup>.

Another potential pathway linking meat and animal product consumption with CVDs is via the contribution of fat consumption to rising rates of obesity and, thereby, to a wide range of obesity-linked illnesses, including diabetes<sup>26</sup>. All fats, whether from animals or plants, are a concentrated source of energy (calories)<sup>27</sup> so reducing the proportion of fat in the diet will help to reduce obesity and its associated conditions.

However, oily fish contain omega-3 fats which have been linked to a reduced risk of coronary heart disease. Thus current government advice is to eat at least two portions of fish a week, one of which should be oily fish (such as salmon and trout). Unfortunately, farmed salmon may contain two to three times less omega-3 fats than their wild equivalent<sup>28</sup>. Moreover, farmed Atlantic salmon is 50-70% higher in total

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<sup>22</sup> Williams, V, *Do you live in a food desert?* Landworker, November/December 2000. Transport and General Workers' Union: London

<sup>23</sup> Webb, A, *Food Poverty: Policy Options for the New Millennium*. 2001. Sustain: London

<sup>24</sup> Key, T J et al. 1999. Health benefits of a vegetarian diet. *Proceedings of the Nutrition Society* v.58 p.271-5

<sup>25</sup> Thorogood, M et al. 1994. Risk from death from cancer and ischaemic heart disease in meat and non-meat eaters. *BMJ* v.308 p.1667-1671

<sup>26</sup> National Audit Office, 2001. *Tackling Obesity in England*. NAO: London

<sup>27</sup> Fat contains around 9 calories per gram, whereas protein and carbohydrate contain around 4 calories per gram.

<sup>28</sup> Staniford, D., 2001. *Intensive Sea Cage Fish Farming: The One That Got Away*. Paper presented at Coastal Management for Sustainability – Review and Future Trends, University of London, January 2001. Friends of the Earth Scotland: Edinburgh. Cited in Lymbery, P. *In too deep – the welfare of intensively farmed fish*. Compassion in World Farming Trust, 2002



fat, and farmed rainbow trout is 20-55% fattier than their wild equivalents<sup>29</sup>. This rather undermines the health case for eating fish. Arguably, government should abandon – at least for the moment – advice to eat more fish since, if it was followed across the population, this could wipe out the remaining fish stocks. Moreover, omega-3 fats can be obtained from oils such as flax, rapeseed and soya.

Indeed, omega-3 fats can also be obtained from beef, but the amounts depend on the sex, breed and, importantly, the diet of the animal. Some recent research indicates that forage (i.e. grass) based diets (which form the basis of organic cattle production systems) can decrease saturated fat concentrations but increase the concentrations of omega-3 fats. Moreover, milk from animals fed on a forage based diet also contains improved levels of potentially beneficial fatty acids, especially conjugated linoleic acid.<sup>30 31 32 33 34</sup>

### Osteoporosis

Given the ageing of the population, diseases linked to ageing - such as osteoporosis - are likely to increase. Several studies have found that vegetarians are at lower risk of suffering from this condition, and that some countries – and groups within countries – consuming a diet high in animal protein show higher rates of hip fractures (associated with osteoporosis)<sup>35</sup>.

Other diet-related conditions showing an association with meat and/or dairy consumption include: diabetes, gallstones, kidney disease, rheumatoid arthritis, diverticular disease, and appendicitis<sup>36</sup>.

(Note: Despite iron from plant foods being less easily absorbed than that from meat, evidence shows<sup>37</sup> that vegetarians are no more likely to suffer from iron deficiency anaemia than meat eaters.)

In short, there is a body of evidence to show that diets based on plants – particularly fruit and vegetables, whole grain cereals, and pulses – protect against a wide range of

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<sup>29</sup> USDA Nutrient Database, 2001. US Department of Agriculture, Agricultural Research Service. 1999. USDA Nutrient Database for Standard Reference, Release 13. Nutrient Data Laboratory Home Page <http://www.nal.usda.gov/fnic/foodcomp> 19<sup>th</sup> March 2001.

<sup>30</sup> Warren, H., et al. (2002). The effects of breed and diet on the lipid composition and meat quality of bovine muscle. Proceedings of the 48th International Congress of Meat Science and Technology, Rome.

<sup>31</sup> Scollan, N.D. and Wood, J.D. (2000). Improving the nutritional value and eating quality of beef. Pages 29-42 in British Grassland Society Occasional Symposium No. 35 Beef from grass and forage (Editor Dr D. Pullar).

<sup>32</sup> R & H Hall (1999) The quality of meat from beef cattle: is it influenced by diet? Technical bulletin issue No. 4 ~ 1999.[http://www.rhhall.ie/print/issue4\\_1999.html](http://www.rhhall.ie/print/issue4_1999.html)

<sup>33</sup> French, P., et al. (1999). Fatty acid composition, including conjugated linoleic acid, of intramuscular fat from steers offered grazed grass, grass silage or concentrate-based diets. Journal of Animal Science (submitted).

<sup>35</sup> Abelow, B J et al. 1992 Cross-cultural association between dietary animal protein and hip-fracture. *Calcified Tissue International* v.50 p.14-18

<sup>36</sup> References for each disease are included in *Health and Vegetarians*, a factsheet available from the Vegetarian Society – [www.vegsoc.org](http://www.vegsoc.org)

<sup>37</sup> Draper, A & Wheeler, E. 1989 The diet and food choice of vegetarians in Great London. Centre of Human Nutrition: London

chronic and sometimes fatal conditions. Demand for meat and animal products in the UK and other industrialised countries is already largely static or falling, and it would promote public health – as well as animal welfare, and sustainable development more generally – if government encouraged these trends.

Currently there is no sign that the links between animal, human and environmental health – in the broad sense we have described in this document – are integrated into government policies, practices or structures. The establishment of the new Health Protection Agency provides one opportunity, among many, to institutionalise such links and we recommend these be explored.

### **ADD A livestock industry that enhances, rather than damages, the natural environment by**

- **Reducing to a minimum transport of meat and other livestock products, and ending the long distance transport of live animals**

Rationale: The current food system is over-reliant on non-renewable fossil fuel, particularly oil, especially in food transportation. This dependence on oil is potentially disastrous since supplies are finite<sup>38</sup> and subject to disruption<sup>39</sup>, and their use contributes to climate change<sup>40</sup> and environmental damage<sup>41</sup>. Despite this, meat and other livestock products which could be and are produced and consumed here are both exported, and imported<sup>42</sup>, using considerable quantities of oil.

Moreover, the damage to animal health and welfare caused by transporting live animals, and by the handling and mixing en route – for example at livestock markets – has been well documented<sup>43 44</sup>. Live animal transport, and mixing animals at livestock markets also contributes directly to the faster and wider spread of any infectious diseases.

Investment in infrastructure such as abattoirs, meat cutting plants and dairies, coupled with disincentives for oil-based transport and livestock markets<sup>45</sup> should further encourage a localised food chain<sup>46</sup> where meat is consumed as close as possible to where animals were reared. Local food systems also help to increase employment in local farming and food industries<sup>47</sup>.

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<sup>38</sup> It has been calculated that crude oil reserves will be exhausted by 2040. Oil Reserves. Medea. – European Agency for international Information at [www.medeabe/en/](http://www.medeabe/en/)

<sup>39</sup> Prices of crude oil doubled or trebled in 1973, 1980, 1991 and 2000. Cited in Jones, A, *Eating Oil: Food supply in a changing climate*. 2001. Sustain: London

<sup>40</sup> See analysis and recommendations by the Intergovernmental Panel on Climate Change and the Royal Commission on Environmental Pollution

<sup>41</sup> Jones, A, *Eating Oil: Food supply in a changing climate*. 2001. Sustain: London

<sup>42</sup> Lucas, C. *Stopping the great food swap: Relocalising Europe's food supply*. 2001. The Greens/European Free Alliance in the European Parliament: Brussels.

<sup>43</sup> *Live Exports: A cruel and archaic trade that must be ended*. 1999. Compassion in World Farming

<sup>44</sup> Martin, P., 1997. *The Sickening Mind. Brain, Behaviour, Immunity and Disease*. Harper Collins.

<sup>45</sup> For example, Government could prohibit animals being exposed for re-sale at any market, within say 20 days of having been sold at a market.

<sup>46</sup> *A sustainable food supply chain*. Report 4966. 1999. Swedish Environmental Protection Agency: Stockholm.

<sup>47</sup> *Plugging the leaks*. 2001. New Economics Foundation: London

Shorter food miles and a more robust local food sector will, in addition, help meet the increasing demand for full traceability throughout the food chain. This is demanded both by final consumers and by the farming and food sector itself. The former continue to insist on their right to choose between products of different provenance and from different production systems. The latter need to meet, and be seen to meet specifications from intermediate buyers, demonstrate “due diligence” as part of protecting their liability under food law, and recall products if the need arises.

- **ADD Reducing the waste from intensive livestock systems**

Rationale: Gaseous, liquid and solid waste from intensive livestock systems is too often inadequately disposed of or treated, and becomes a source of pollution. For example, waste from dairy farming is responsible for more water pollution incidents than any other industry<sup>48</sup>. Methane contributes almost half of the 10% of greenhouse gases generated by UK agriculture<sup>49</sup>, thereby exacerbating global warming<sup>50</sup>. In addition, if manure – one of the major sources of methane - was kept and distributed more effectively, it would reduce the need for artificial fertilisers, which themselves generate greenhouse gases. In addition, over-use of fertilizer (including manure, if not properly managed) can damage soil and biodiversity<sup>51</sup>.

Solid waste from fish faeces and excess feed contaminates the marine environment. In 2000, Scotland’s fish farming industry produced an estimated 7,500 tonnes of nitrogen and 1,240 tonnes of phosphorous (comparable to the sewage output from 3.2 and 9.4 million people, respectively)<sup>52</sup>.

In addition, failure to deal adequately with waste in the meat sector has led to unsafe meat fraudulently re-entering the food chain<sup>53 54</sup>.

Reducing the numbers of animals farmed, and the intensity of the farming methods, will reduce the concentration of waste and, hence, disposal problems. Reducing the use of veterinary drugs will also cut the 500,000 tonnes of agricultural waste produced annually, by reducing container waste. At the same time, there should be further government research into and support for environmentally sustainable methods of composting animal waste and returning nutrients to the land (see below).

- **ADD Improving land quality, by ending over-grazing and returning nutrients to the soil**

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<sup>48</sup> Environment Agency 2001. Quoted in *Agriculture and Natural Resources*, May 2002, Environment Agency

<sup>49</sup> Duchateau, K. & Vidal C. 2003. Eurostat. <http://europa.eu.int/comm/eurostat/Public/datashop/print-catalogue/EN?catalogue=Eurostat&theme=8-Environment%20and%20Energy>

<sup>50</sup> Subak, S & Kelly, M. 1996 *The BSE Crisis and UK Greenhouse Gas Emissions. Policy Briefing No.1*. Centre for Social and Economic Research in the Global Environment

<sup>51</sup> *Junk food for plants*. 2002. Plantlife: London

<sup>52</sup> MacGarvin, M., 2000. Scotland’s secret – aquaculture, nutrient pollution, eutrophication and toxic blooms. WWF Scotland: Aberfeldy. Cited in Lymbery, P. *In too deep – the welfare of intensively farmed fish*. Compassion in World Farming Trust, 2002

<sup>53</sup> *The Report of the Waste Food Task Force*. 2003. Food Standards Agency: London

<sup>54</sup> *Meat not even suitable for pet food*. p.iii in Food Law Enforcement supplement in Food Standards News No.26 March 2003. Food Standards Agency: London

**Rationale:** At the same time as the environment is being over-burdened with some agricultural bi-products and waste, valuable nutrients are also being lost from the food cycle due to low composting rates. Composts and other organic manures have higher levels of many nutrients than inorganic fertilisers, which concentrate on yield promoting macronutrients at the expense of important trace elements. This lack of balanced nutrients has led to over reliance on artificial fertilisers, even though sufficient amounts of most of the key nutrients already exist in manures and simply need to be redistributed<sup>55</sup>. While progress is being made, a good deal more can and should be done to turn waste into productive compost<sup>56</sup>.

Another effect of large numbers of farm animals is over-grazing. Excessive numbers of sheep are causing serious damage to environmentally sensitive areas such as heather moorlands, hill grasslands, and wetlands<sup>57</sup>. While measures have recently been announced to tackle this problem, a steeper – but still well controlled – decline in sheep numbers and stocking densities will improve the effectiveness of any measures. Reduced stocking rates will also help reduce parasites and diseases in livestock.

- **ADD Increasing natural genetic diversity among farmed animals, and adopting farming practices that enhance biodiversity in wildlife**

**Rationale:** Selective breeding,<sup>58</sup> and a shrinking genetic pool of farmed livestock<sup>59</sup>, has increased susceptibility to disease and encouraged rapid spread of disease among genetically similar animals. For example, metabolic disorders such as milk fever are reportedly more likely when breeding from a smaller gene pool, as are problems with calving. Additional investment, including research, into traditional and rare breeds of animals may reveal beneficial traits such as disease resistance and nutritional benefits for humans<sup>60</sup>. Reintroducing such breeds should further reduce the spread of disease through genetically similar (or identical) stock, and these breeds may be more appropriate for organic and other extensive livestock systems.

Indeed, less intensive systems, including organic farming systems, tend to use a wider variety of livestock breeds and have also been demonstrated to increase the size of populations and variety of wildlife on farms<sup>61</sup>. Government's Organic Action plan<sup>62</sup> should help to increase the number and spread of organic farms, but more could be done. For example, DEFRA could allocate a significant proportion of its research and development budget to examining and promoting ways to enhance the viability of organic livestock systems, including through research into livestock breeding.

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<sup>55</sup> English Nature. 2002. *The role of economic instruments in managing diffuse nutrient pollution No. 462*.

<sup>56</sup> See the range of materials available from the Composting Association – [www.compost.org.uk](http://www.compost.org.uk)

<sup>57</sup> English Nature Seventh Annual Report, 1997/1998. English Nature: Peterborough

<sup>58</sup> Norris, K & Evans, M. 200. *Susceptibility to disease – paying the price for productive farm animals?* Unpublished submission (No. 142), from Reading and Stirling Universities, to the Royal Society Inquiry into Infectious Diseases in Livestock

<sup>59</sup> *Choosing sustainable agriculture, challenging industrial agriculture*. 2001. UK Food Group conference, Kew Gardens, 26 February 2001. UKFG: London

<sup>60</sup> Crawford, M A, *Fat animals – fat people*. July-August 1991. *World Health*.

<sup>61</sup> Fookes, C, Dalmeny, K, *Organic food and farming – myth and reality. Organic vs non-organic: the facts*. 2001. Soil Association: Bristol and Sustain: London

<sup>62</sup> *Organic Action Plan*, 2002. Department for Environment Food and Rural Affairs: London

*A better informed and more effective livestock industry which is*

- *Highly skilled **ADD and adequately remunerated***

Rationale: Farmers and farm workers are continuing to leave the sector, either retiring or being driven from the market by economic pressures<sup>63</sup> (some to the point of suicide). Given the current unattractiveness of the sector, coupled with barriers to entry<sup>64</sup>, the sector may soon be facing a recruitment crisis. Moreover, those lost to farming take with them invaluable local knowledge and skills. To help the farming and food sector attract and retain good quality employees, the UK Government should increase the minimum wage and ensure a wide range of high quality training courses in farming, covering issues such as nutrition, conservation, marketing and food hygiene as well as stockmanship and animal welfare. Much of this training will be privately provided, but government has a responsibility ensure high standards, and to provide funding for, e.g., unemployed, older or low skilled workers, to ease the transition into better quality jobs.

More generally, measures should be explored to reverse the dramatic decline in the proportion of profit in the food chain accruing to primary producers<sup>65</sup>. From farmers receiving around 50 pence in the food pound in the 1950s, the proportion has all but collapsed to around 10 pence in 2000, undermining the economic viability of farming. Remedial measures might include improving the content and implementation of the Office of Fair Trading Code of Practice between supermarkets and their suppliers<sup>66</sup>. This would help address the 27 practices which the Competition Commission found operating “against the public interest” in its inquiry. Predatory pricing, for example, could be made illegal, as it has been in Spain (1996 Trade Law Regulations), France (1997 Loi Galland), Ireland and several States in North America.

- *Efficient, sustainable and profitable*
- *Applying best practice in disease prevention (biosecurity), whether through **ADD high quality assurance and health schemes or in other ways***

Rationale: The Food Standards Agency, alongside a wide range of consumer<sup>67</sup>, health<sup>68</sup> and environmental organisations<sup>69</sup> have expressed serious reservations about the current standards for and operation of farm assurance schemes. In many cases, farm assurance schemes do no, or little, more than require farmers to obey the law and DEFRA Codes. As a result, many assurance schemes may be misleading the public as they assert or imply that they deliver high animal welfare standards, which is false.

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<sup>63</sup> In the two years to June 2000 51,300 farmers and farm workers left the industry. National Farmers' Union Farming Fact Sheet, 25 October 2001. [www.nfu.org.uk](http://www.nfu.org.uk)

<sup>64</sup> Hird, V, *Double yield: Jobs and sustainable food production*. 1987. SAFE Alliance. Available from Sustain: London

<sup>65</sup> For a fuller exploration of the effects on animal welfare of financial pressure on farmers, please see the response to this consultation by Elm Farm Research Centre.

<sup>66</sup> Competition Commission. *Supermarkets: A report on the supply of groceries from multiple stores in the UK. Vol I, II, and III*. 2000. Competition Commission: London

<sup>67</sup> *Bamboozled, Baffled and Bombarded: Consumers' views on voluntary food labelling*. 2003. National Consumer Council: London

<sup>68</sup> *Challenging the Little Red Tractor*, The Food Magazine, Issue 52, January/March 2001. The Food Commission: London

<sup>69</sup> Friends of the Earth – [www.foe.co.uk](http://www.foe.co.uk)

By contrast, and as acknowledged in government's Organic Action Plan (see above), food with an organic label is backed by a legally defined, international inspection and certification system, which delivers high standards of animal welfare. Thus, assurance schemes, and associated labelling could make a contribution to improving animal welfare, but only if scheme members adopt genuinely high standards, and if the schemes operate – and are seen to operate – independently of commercial interests.

- *Aware of its role in producing safe food*
- *Working closely with private veterinary practices*
- *Set in the context of a thriving countryside and rural economy*
- *Aware and appreciative of the widest impact of animal health on society and our natural resources, biodiversity, environment etc.*

*The capacity to deal swiftly and effectively with any disease emergency*

- *Improved and transparent handling of animal disease outbreaks **ADD, in particular using vaccination as a first, rather than last resort***

Rationale: It is widely agreed that the measures used to try to contain the Foot and Mouth Disease epidemic – especially mass culling of contiguous premises and subsequent disposal problems – was more damaging to the farming industry and rural economy than the disease itself. In any future outbreak, emergency vaccination must be used to help contain the disease. There should be no mass culls on contiguous premises, and slaughter should only take place on infected and, where necessary, “dangerous contact” premises.

In addition, research must be undertaken into effective killing methods in field situations. For example, it is still not clear whether the captive bolt kills (rather than just stuns) animals, especially sheep. It is also not known how best to deal with young and heavily pregnant animals. Detailed strategies must be developed for killing all species and age ranges in the field. Moreover, properly trained field killing teams should be developed. To be included in such a team, slaughtermen should be required to hold a special licence for killing in the field.

- *A reduced level of international threat to animal health and more effective and a greater awareness of import controls **ADD which will be eased by a reduced volume of trade in animal products and a prohibition on trade in live animals***

Rationale: See the case put forward above for reducing transport distances and reinvesting in local food systems, and for reducing demand for meat and animal products.

*A policy framework which allows*

- *Government intervention that is clear and justified **ADD including at European and international level***

Rationale: As noted above, the UK Government should play an energetic role in encouraging the integration of high animal health and welfare standards into European and international policies. Currently, there is no level playing field within the EU, for example with UK pig producers claiming to be disadvantaged by our higher

standards. Expansion of the EU is likely to exacerbate these problems unless measures are taken to raise standards across the whole EU. Arguably, the Common Agricultural Policy (CAP) is one of the most powerful mechanisms for improving animal health and welfare standards, and the UK should support the European Commission's current proposals to do this. The three animal welfare proposals for which we particularly urge support are:

- **Cross-compliance:** Receipt of the new single farm payment will be conditional on compliance with, among other things, animal health and welfare standards laid down by law. This will give farmers a clear incentive to comply with the welfare laws since, if they do not, their subsidies may be at risk.
- **Meeting standards:** EU countries will be able to help farmers with the costs of changing to demanding standards based on EU laws, including on animal welfare.
- **Financial help for farmers who go beyond legally required standards:** This is a particularly valuable proposal under which farmers can be helped with the costs investing in very high welfare systems, such as are found in some excellent free-range broiler systems in various EU countries<sup>70</sup>.

In addition, overproduction of meat and animal products, coupled with export subsidies permitted by the CAP, allows the UK to join other EU countries in “dumping” produce – particularly beef and powdered milk<sup>71 72</sup> - in poorer, Southern countries. These export subsidies damage the economies of poorer countries and should be phased out immediately.

- **Regulation kept to the minimum necessary and appropriately enforced **ADD** by adequate numbers of well-trained and properly funded enforcement officers**

Rationale: The appropriate principle to guide regulations is that they should be appropriate to achieve the intended objective, not that they should be minimised *per se*. In addition, inadequate funding and numbers of staff for food law enforcement, including laboratory analysis services, have undermined the effectiveness of enforcement. A recruitment crisis is currently exacerbating an already serious problem, allowing hygiene<sup>73</sup> and food standards legislation<sup>74</sup> to be flouted routinely. Indeed, under funding of enforcement may have contributed to recent animal disease out breaks, thought to be caused by contaminated meat not being detained at ports of entry. Strict enforcement of hygiene and biosecurity standards, including at entry ports, would reduce the risk of disease and send a message to the rest of the world that poor standards of welfare and hygiene are unacceptable.

While we applaud the measures already taken to tighten up enforcement of illegal meat imports, more should be done. The Food Standards Agency, for example, could provide financial and legal support for improved food law enforcement. Current

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<sup>70</sup> *Free-range broiler farms in the EU*. Compassion in World Farming. To be published later in 2003.

<sup>71</sup> *Farmgate: The Developmental Impact of agricultural subsidies*, 2002. ActionAid, London;

<sup>72</sup> *Milking the CAP: How Europe's Dairy Regime is devastating livelihoods in the developing world*. 2002. Oxfam: Oxford. [www.oxfam.org.uk](http://www.oxfam.org.uk)

<sup>73</sup> See *Environmental Health News*, *passim* Chartered Institute of Environmental Health: London

<sup>74</sup> *The Food Magazine*. *passim*. The Food Commission: London

proposals include a “fighting fund” for legal test cases, introducing improvement/prohibition notices for food labelling offences<sup>75</sup>, and higher fines for those found guilty of infringing the law. Additional funding will also be required to recruit, train and retain additional law enforcement officers, including in animal health and welfare, to take on the additional work entailed in more vigorous law enforcement.

- *Clear strategies to be agreed with stakeholders for major diseases*

*Professional veterinary services which are*

- *Skilled to support animal health and welfare best practice*
- *Used by livestock keepers to promote health as well as respond to disease and welfare problems*
- *Joined-up working between the State Veterinary Service, the Veterinary Laboratories Agency, the Meat Hygiene Service and private veterinary practices*

Comment: It is clear that these aims will not be met so long as veterinary income depends largely on prescribing drugs and undertaking surgery and other procedures. Financial incentives will need to be developed to allow veterinarians to continue to make a living from providing animal health promotion services, and to encourage co-operation between the agencies and professions mentioned above. Similarly, livestock keepers operating at the edge of profitability are unlikely to be able to afford veterinary advice to promote animal health and prevent illness. Government assistance, perhaps through the cross-compliance and other measures summarised above, will very probably be required.

*Use of science to ensure*

- *Policy which is evidence based and scientifically informed*
- *Research is targeted on priority areas **ADD particularly into humane and sustainable alternatives to intensive systems, such as organic farming***

Public funding is declining as a proportion of research in the farming and food sector. Research institutes are increasingly dependent on commercial sources of funding to continue and develop their work<sup>76</sup>. This skews research priorities towards issues which interest companies that are doing well out of the current system. Private funding also means that valuable research results can be kept out of the public domain. By contrast, research into alternatives to intensive systems is under-funded. For a variety of reasons, even publicly funded research has begun to reflect commercial interests. For example, research into GM food (which attracts no discernable consumer demand, but considerable commercial support) absorbed some £27 million government funding in 2000. By contrast, research into organic systems (where there is chronic under-supply for the current demand) received a mere £2 million in 2000<sup>77</sup>. While recent increases in funding for research into organic systems are welcome, the area remains chronically under-funded.

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<sup>75</sup> *Enforcement Options in Food Standards Enforcement*. 2001. Unpublished submission to the Food Standards Agency by the Local Authority Co-ordinators of Regulatory Services (LACORS): London

<sup>76</sup> Science Policy Research Unit, Sussex University

<sup>77</sup> Answer by Ms Quinn (4 February 2000) to question by Joan Ruddock, MP



The balance of publicly funded research should therefore be shifted out of areas underpinning the current low welfare systems and into areas that show greater promise in terms of their contribution to sustainability, health and livelihoods. Overall, governments should increase public funding for research in the farming and food sector, and ensure that the results are widely publicised.

- *Veterinary surveillance is targeted on priority areas*
- *An active horizon scanning programme”*

**3. WHAT ECONOMIC, SOCIAL, ENVIRONMENTAL AND WELFARE BENEFITS ARE YOU LOOKING FOR FROM THE STRATEGY? WHAT COSTS NEED TO BE TAKEN INTO ACCOUNT? AND HOW SHOULD THESE BE BALANCED?**

An animal health and welfare strategy should provide:

- ❖ Sustainability, by which we mean, in Brundtland’s definition<sup>78</sup>, the capacity to provide for the needs of the current generation without compromising the ability to provide adequately for future generations. This holistic approach encompasses social and economic goals (see below) alongside environmental imperatives.
- ❖ Health, by which we mean, using the World Health Organisation’s definition<sup>79</sup>, physical and mental well-being, not merely the absence of disease, both for humans and animals.
- ❖ Livelihoods, by which we mean, jobs that provide a living wage, with good working conditions, rights to protection and opportunities for development.

In providing this for UK citizens, the sector should, at worst, not undermine the provision of the same for other countries and, at best, contribute to achieving these goals for other countries, particularly for the poorest.

Elements of these three key requirements, which are inter-related, include:

- ❖ Sustainability:
  - clean air and water to support human, animal and plant life;
  - rich natural habitats (both land and water-based) that will support abundant and diverse wildlife;
  - natural genetic diversity in farmed plants and animals, to reduce vulnerability to diseases, preserve our heritage and enrich our diets;
  - high animal welfare standards, to preserve their, and our dignity and improve animals’ resistance to diseases, some of which are zoonotic;
  - careful husbandry of non-renewable natural resources, including the soil, to reduce waste and pollution, and allow time to switch to renewable alternatives.
- ❖ Health:
  - food uncontaminated by microbiological poisons or toxic residues;

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<sup>78</sup>World Commission on Environment and Development, *Our Common Future*, 1987. Oxford University Press. This concept, and its application to the farming and food sector, is explored in more detail in Sustain’s response to DEFRA’s consultation document, *A new department – a new agenda*. 2001. Unpublished,

<sup>79</sup> *Health21 – Health for All in the 21<sup>st</sup> Century*, 1999, World Health Organisation Regional Office for Europe

- food that does not compromise our resistance to infection, or render ineffective medical treatments;
- a food supply that is nutrient-dense, fibre-rich and provides essential fats to reduce the risks of developing cardiovascular diseases, some cancers and other diet-related illnesses. (This largely comprises a variety of whole-grain cereals and other starchy staples, plentiful and varied vegetables and fruit, diverse nuts, seeds and pulses, some dairy produce and, for non-vegetarians, occasional fish and meat);
- access to the best quality food (as outlined above) for the most vulnerable in society, particularly low income groups and, especially, babies and children, elderly people, and those who are ill.

❖ **Livelihoods:**

- jobs in the farming and food sector, whether private or public, that provide a living wage;
- working conditions that do not endanger health or well-being;
- on and/or off-the-job training that offers opportunities for personal development and acquiring flexible skills.

Underpinning what citizens expect are the following rights and responsibilities:

- to receive adequate food knowledge and skills from the education system, and to use these to make choices that will optimise sustainability, health and livelihoods;
- to be thoroughly protected from information about farming and food which is dishonest, illegal and untrue;
- to have a choice of ways to obtain food, and to use these choices to retain diversity;
- to have democratic control over decisions that will affect the farming and food sector, and to take the opportunities offered to participate in these decisions.

The issue of costs has been dealt with above, which outlines the marginal extra costs which might be entailed in improving animal health and welfare.

**4. CAN YOU IDENTIFY ANY POTENTIAL CONFLICTS OR RISKS THAT MIGHT CHALLENGE THE DRAFT VISION?**

Those parts of the intensive livestock industry that do well out of the current system are likely to resist the changes proposed here. In addition, many will argue that the current global trading systems militates against the UK and EU raising its animal health and welfare standards still higher, against a background of low standards globally. However, we have argued that WTO rules are open to interpretation and should provide no obstacle to higher standards, provided that animal health and welfare rules are not applied in a discriminatory manner, and that assistance is given to poorer countries to comply with higher standards.

In terms of handling risks and uncertainty, we are pleased to note Government's acknowledgement of the precautionary principle in the recent report from the Cabinet Office Strategy Unit.<sup>80</sup>

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<sup>80</sup> *Risk: Improving government's capability to handle risk and uncertainty*, 2002. Cabinet Office Strategy Unit: London

## **5. HOW CAN WE BUILD THE NEW CONTRACT AND MAKE PARTNERSHIPS WITH STAKEHOLDERS WORK?**

A tangible way for Government to demonstrate its commitment to high animal health and welfare standards, and for businesses to see that economic opportunities exist in this area, is to incorporate high animal health and welfare standards into public sector catering contracts. Catering funded by the public sector, whether or not provided by it, should – in any event - be used to pursue public policy on sustainability, health and livelihoods. Thus, food should be supplied by local producers, to high nutrition and microbiological safety standards (particularly for vulnerable groups such as children, elderly people<sup>81</sup> and those suffering from illness), and produced to the highest animal welfare standards, such as in organic systems. Such initiatives have been successfully introduced in France and Italy, and are developing in the UK<sup>82 83</sup>. Changes to EU and national rules on public procurement contracts, though helpful in the longer term, may not be needed immediately. What will certainly be needed is increased funding for public sector catering contracts.

## **6. WHAT IS YOUR MOST IMPORTANT LONG-TERM ANIMAL HEALTH AND WELFARE PRIORITY? DO YOU AGREE WITH THE ISSUES AND THEMES FROM STAKEHOLDER MEETINGS (SUMMARISED IN THE CONSULTATION DOCUMENT)? DO YOU HAVE ANY TO ADD?**

Sustainable development, as outlined in the answer to question three above, is the most important long-term priority which will lead to higher animal health and welfare standards. Government has recognised that organic farming uses less energy, no artificial fertilizers and virtually no pesticides, creates less waste, benefits biodiversity, and also has high standards of animal welfare. It is logical, therefore, that the role of organic farming in promoting more sustainable agriculture should be explicitly acknowledged in the animal health and welfare strategy.

Instead of the current “race to the bottom”, policy changes to reduce demand for animal products, plus a favourable policy framework as outlined above could offer the livestock sector the opportunity to escape the downward spiral of cost reduction and, instead, focus on a smaller volume of higher quality produce for domestic consumption (for which they receive fairer prices<sup>84</sup>), set in the context of vibrant local food economies. Indeed, there are already signs of this type of market development in the sales growth of organic produce and at farmers’ markets. A smaller number of livestock, kept to higher welfare standards, with little or no long distance transport and greatly reduced trade is likely to reduce susceptibility to a wide range of endemic

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<sup>81</sup> See the series of nutritional guidelines for catering for vulnerable groups produced by the Caroline Walker Trust. [www.cwt.org.uk](http://www.cwt.org.uk)

<sup>82</sup> *Good food for all. Proceedings of a conference, Reading, May 2001.* East Anglia Food Links: Norfolk.

<sup>83</sup> Manual for Sustainability in Public Sector Catering, Sustain, In press

<sup>84</sup> It has not been possible to calculate the extent to which fairer prices, coupled with reduced costs from the other changes suggested, would more than compensate for reduced volumes of animal products. However, even if income did decline in the short term, government savings (e.g. from reduced costs of surpluses), could be redirected to livestock farmers for providing environmental and other public goods.

and exotic diseases, ease the complexity of surveillance and monitoring, and reduce the spread of any diseases that do occur.

Sustain has no detailed comments to offer on the issues and themes from the stakeholder meetings.

**7. YOUR VIEWS ARE SOUGHT ON THE VALUE OF ANIMAL HEALTH PLANS: DO YOU THINK THIS IS SOMETHING THAT SHOULD BE EXPECTED FROM ALL ANIMAL KEEPERS?**

There is potential to harness a mandatory food and farm licensing system to improve animal health and welfare standards, by incorporating animal health plans into licensing. We are unconvinced that voluntary systems will be effective, since it is likely that those animal keepers least willing to comply with a voluntary system will generate most animal health and welfare problems. The Consumers Association, the Chartered Institute for Environmental Health and the Local Authorities Co-ordinators of Regulatory Services all recommend that farm and food premises, and the key food handlers who work in them, should be licensed before they can operate, and regularly checked thereafter. This should ensure that farm and food workers are adequately trained in the principles of Hazard Analysis and Critical Control Points (the internationally accepted approach to improving food safety), that premises are suitable for food preparation and that, as a consequence, the incidence of microbiological contamination of food declines. Adding animal health plans should have commensurate benefits.

However, it is important, particularly for small and specialist businesses that the process of licensing should avoid burdensome paperwork, and that any license fee should not be set so high as to disadvantage such businesses.

**8. HAVE WE SET OUT ACCURATELY THE ROLES OF GOVERNMENT, THE LIVESTOCK INDUSTRY, AND OTHER STAKEHOLDERS? IS THE CURRENT BALANCE OF GOVERNMENT INTERVENTION RIGHT? WHAT ARE YOUR VIEWS AS A TAXPAYER?**

As outlined above, Sustain agrees with the approach now being suggested by the Commission in the most recent proposals for CAP reform: that taxpayers' money should be used to support policies, such as high animal welfare standards, for which widespread public support can be demonstrated. While the UK Government can claim some credit for promoting animal health and welfare at European and international level, other EU governments have a better record and a more vigorous approach (see above) should now be pursued.

**9. DO YOU HAVE VIEWS ON THE SCOPE OF THE STRATEGY AND HOW FAR BEYOND FARMED LIVESTOCK AND COMPANION ANIMALS IT SHOULD EXTEND?**

Sustain's remit extends only to food and farming, so our comments are restricted to animal health and welfare issues that affect farmed livestock, including fish. Issues outside that remit are left to others better qualified to comment.

**10. FOR ENGLAND AND WALES, A COMMITMENT WAS MADE IN THE FMD INQUIRY RESPONSE TO SEEK VIEWS ON THE REGULAR REVIEWING AND ISSUING OF PROGRESS REPORTS ON THE STATE OF EMERGENCY PREPAREDNESS: WHAT DO YOU THINK WOULD BE THE MOST APPROPRIATE FORMAT FOR THESE? HOW OFTEN DO YOU THINK GOVERNMENT SHOULD ISSUE THEM?**

Sustain has no detailed comments to offer on these specific issues.

7 April 2003

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*In supporting this document, each of the following organisations is indicating its formal agreement only in those areas where it has specific competence. At the same time, each acknowledges the expertise and authority of the other organisations in their respective fields. In addition, collectively the following organisations endorse the principles outlined in response to question number three on the environmental, social and economic benefits that an animal health and welfare strategy should deliver.*

British Dietetic Association  
British Heart Foundation Health  
Promotion Research Group  
Chartered Institute of Environmental  
Health  
Community Nutrition Group  
Compassion in World Farming  
Department of Health Management and  
Food Policy, City University  
East Anglia Food Link  
Ecological Foundation  
Elm Farm Research Centre  
Faculty of Public Health Medicine  
Family Farmers Association  
Farmers Link  
Food Commission  
Foundation for Local Food Initiatives  
Friends of the Earth  
Guild of Food Writers  
Haemolytic Uraemic Syndrome Help  
(HUSH) – UK E.Coli Support Group  
Health Education Trust  
Land Heritage  
National Consumer Federation

National Council of Women  
National Heart Forum  
National Oral Health Promotion Group  
Oral Health Promotion Research Group  
Soil Association  
UK Public Health Association  
Women's Environmental Network  
Women's Food and Farming Union  
World Cancer Research Fund  
World-Wide Opportunities on Organic  
Farms

*List correct as of 22 April 2003*