

Farmwel advocates policies to enable a transition to sustainable and accountable mainstream agriculture and aquaculture. ⁱ Farmwel is funded by Sankalpa. ⁱⁱ

Our vision for sustainable agriculture

- A prosperous, innovative, and resilient food industry
- Restoring and balancing natural capital, so that our farm land continues to provide good food forever
- High quality sustainable food, standards, and technologies that we can export proudly around the world

Key principles for sustainable agriculture

- Mitigating greenhouse gas pollution
- Integration with biodiversity
- Good farm animal welfare
- High quality food production

Priorities for the Agriculture Bill

We seek an Agriculture Bill that:

- Changes the basis of farm payments, so that English farmers are rewarded for public goods and environmental services
- Achieves best value for taxpayers by requiring multiple sustainability outcomes in return for public funds
- Empowers the vast majority of farmers to increase sustainability on their farms
- Supports rapid transition away from intensive methods of farming
- Ends public funding of the most intensive methods of farming, including intensive livestock production
- Establishes the means to collect data to support a national approach to sustainability metrics

We welcome this bill's introduction and ambition as it sets out the means to deliver many of the priorities we believe are necessary to deliver sustainable agricultural land use and food production in the UK. We also believe that the bill could be strengthened in key areas.

Farm animal welfare and sustainability

We believe good farm animal welfare is an important end in itself. We should respond to the challenges presented by today's farming methods, recognising sentience and the importance of the five freedoms, and take action to build positive welfare models. Such models should not only avoid negative factors but also provide opportunities for animals to have positive experiences such as the ability to perform their natural behaviours, enjoy fresh air and

daylight and experience the joy of living. It is also important to recognise that each animal is an individual, as well as a member of a herd or flock.

Good farm animal welfare is also essential if we are to deliver in-the-round environmental progress. It is extremely difficult to achieve good environmental outcomes while continuing to keep farm animals in the most intensive farm systems, which rely heavily on high protein feeds produced in arable monocultures, on high levels of fossil fuel and water use, and on routine medications often including human-critical antibiotics. Climate change, biodiversity loss and degradation of natural resources are of equal importance and must be addressed together.

Farm animal welfare metrics

Inputs and outcomes are both important. Farm systems and other inputs are a key determinant of a producer's ability to achieve good welfare, while outcome measures provide a basis for analysing success and identifying where improvements to resources such as housing, space allowance and enrichment are necessary in order to improve outcomes.

Farm animal welfare metrics themselves should be considered from birth to death on a species by species basis, but the core principles are common and can be used to help ensure a good life for all farm animals.

We support the Farm Animal Welfare Council's Good Life Framework, and believe that to obtain an accurate picture of welfare, outcome measures should focus on:

- Mortality
- Disease (including the use of antibiotics)
- Injury (including bruising, feather pecking, and mutilations such as tail docking)
- Mobility (for example, gait scores)
- Behaviour (an animal's ability to display behaviours, which meet their welfare wants and needs - the bed-rock of farm animal welfare science)
- Welfare during transport and at slaughter should be included in a national metrics approach, and the use of both input and outcome measures introduced for all slaughter methods. Slaughter metrics should cover transport, lairage, handling, and slaughter itself.

Inputs measures may include, Housing (e.g. the use of enriched cages for laying hens, farrowing crates for sows and zero-grazing for dairy cows), Outdoor conditions e.g. the use of trees and bushes in the range provided for free range hens, Space allowance, Environmental enrichment, Flooring, Lighting levels, Air quality, Genetics e.g. the use of fast growing broilers and high yielding dairy cows, and finally, the use of behavioural mutilations to 'fit' animals to systems that do not meet their needs.

Many farm animal welfare metrics categories focus on the existence or absence of suffering, and for this reason it is critically important to include measures relating to positive welfare such as the ability to perform natural behaviours. Accordingly we should, for example, measure the ability of laying hens to be able to properly engage in their core behaviours of foraging, perching, dust-bathing and laying their eggs in a nest.

Outcomes and inputs work together to build a comprehensive picture of farm animal welfare. For example, stocking density for broilers (an input) is used as a measure because measuring dust bathing and other natural behaviours are currently difficult and time consuming. In time, motion capture technology may be able to measure this natural behaviour outcome.

Government plans for farm animal welfare

We encourage an approach that reflects the importance of farm animal welfare for its own sake and as an indicator of environmental progress. We support the use of public payments to deliver improved farm animal welfare.

We have been in regular discussion with ministers and officials at Defra about the shape of new financial support arrangements aimed at improving farm animal welfare provision and rewarding excellence. We support the current direction of travel, namely:

1. The provision of one-off support to help producers move towards meeting enhanced standards. This may relate to infrastructure and technology as well as to innovation and its dissemination.
2. Ongoing support to enable producers to continue meeting enhanced standards once they have got there.

Our understanding is that Defra plans to provide ongoing financial support for members of higher welfare schemes who also achieve selected 'iceberg measures' (see appendix 1) – for example an intact unbitten tail on a pig at the point of slaughter. Defra does not plan to pay members of baseline schemes. Higher welfare schemes will need to align with this approach to best support their members.

The provision of one-off support, noted in Point 1 above, is both welcome and extremely important. However, to promote adequate systemic change this financial support may need to be substantial.

In relation to Point 2, we support the allocation of public funds for the successful delivery of 'iceberg measures' developed as part of a national approach to metrics and underpinned by membership of a nationally recognised higher welfare assurance scheme.

Specific comments on the Agriculture Bill

1. We applaud the use of public funds to reward farmers achieving high standards – however, in our view farmers who simply meet minimum legal standards of farm animal welfare should not be eligible to receive any form of public support. This should be made clear in the bill.

2. We believe Part 1 (1) should be amended to include the option of 'Improving biodiversity'.
3. We agree with the EFRA Committee recommendations in relation to public money for public goods that 'Ensuring an effective minimum baseline of regulation will be vital to delivering the Government's proposals to use public money to support public goods.ⁱⁱⁱ Moves towards self-regulation and potential de-regulation following EU exit must not allow a 'race to the bottom'.'
4. To achieve this we believe it will be important to raise standards as soon as we leave the European Union, and to ensure regular review leading to further lifting of standards.
5. We support EFRA recommendations in relation to trade and labelling that Government should improve 'country of origin labelling following the UK's departure from the EU and introduce mandatory method of production labelling.'
6. We agree with EFRA that adequate funding for independent inspections is essential, but we also support increased levels of partnership with farm assurance schemes, and the increased use of risk-based inspections in conjunction with more robust self-reporting and data collection, on-farm and at slaughter.
7. Ongoing work by Defra on the Gold Standard is essential – standardised national metrics will allow more farmers to monitor and compare their day-to-day performance at farm level, support promotion of the national brand, and assist more informed policy making.
8. We are concerned that farmers may be able to enter only part of their farm into an Environmental Land Management contract while continuing to manage large areas of farmland in a business as usual, highly intensive way. We are also concerned that farmers may be able to cherry pick sustainability outcomes, focussing on certain measures (environment/access/heritage) while continuing to rear animals intensively indoors (with poor welfare and intensively-produced feed).
9. We would therefore encourage amendments that require a whole farm approach to Environmental Land Management contracts, and a safeguard against the displacement of environmental externalities.
10. We would encourage amendments that a) require the delivery of multiple public goods, and b) require that some public goods are not delivered to the detriment of other public goods.
11. We agree that it is important to 'improve productivity', but we believe that the best way to do this is to run a healthy, sustainable farm. It is extremely important that improved productivity is linked to improved sustainability and not, for example, to increased use of chemical inputs or the use of more intensive animal rearing systems, which negatively impact an animal's ability to perform natural behaviours, and which rely on unsustainable inputs such as intensive feed production.

12. EFRA has recommended that, 'Defra clearly states that it is Government policy that trade agreements should always contain provision to prevent food which does not meet our environmental, animal welfare and food safety standards from entering the country.' Farmwel agrees with this position.

Appendix 1 – Iceberg outcome measures approach to payments

Government has expressed a keen interest in the use of farm animal welfare 'iceberg measures'. For example, discussion has focussed on the possibility of pig producers earning a premium for bringing their pigs to slaughter with intact unbitten tails. To be eligible for the premium pig producers would also need to be members of a higher welfare assurance scheme, to ensure that a broader range of metrics are being collected and that good standards are being achieved.

This approach is attractive because it utilises a trusted welfare assurance partner to set general standards, and uses a single slaughter metric as the basis for additional payment. This makes welfare payments extremely easy to administer.

For other species single measures indicating very high levels of welfare are unavailable. Instead it will be necessary to focus on two or three metrics, which when achieved together indicate excellent health and welfare. Some of these will be able to be collected at the abattoir, but other measures must be collected on the farm.

These are our current recommendations, which could be implemented alongside *improved legislative standards*.

Finisher pigs

Slaughter metric

Headage basis for payment

Producer must be RSPCA Assured or Soil Association Organic

Outcome measure: Intact unbitten tail at point of slaughter

Rewarding all achievers

Will require excellent system management to achieve better health and welfare

Broilers

On-farm metric

Whole flock basis for payment

Producer must be RSPCA Assured or Soil Association Organic

Outcome measure: Low levels of pododermatitis

Target should be set, which will require standardised national metric and collection method.

Will require excellent flock and system management to achieve better health and welfare

Laying hens

On-farm metric

Whole flock basis for payment

Producer must be RSPCA Assured or Soil Association Organic

Outcome measure: Low mortality and good feather cover score

Target should be set, which will requires standardised national metric and collection method.

Will require excellent flock and system management to achieve better health and welfare

Dairy cows

On-farm metric

Whole herd basis for payment

Producer must be RSPCA Assured or Soil Association Organic

Outcome measure: Low levels of lameness and low levels of mastitis and low levels of anti-microbial use

Target should be set, which will requires standardised national metric and collection method.

Will require excellent herd and system management to achieve better health and welfare

Beef

Slaughter metric

Headage basis for payment

Producer must be RSPCA Assured or organic certified by Soil Association or Organic Farmers & Growers

Outcome measure: High levels of cleanliness (and no clipping) and low levels of lumps, lesions and swellings

Target should be set, which will requires standardised national metric and collection method.

Will require excellent herd and system management to achieve better health and welfare

Lambs

On-farm metric

Whole flock basis for payment

Producer must be RSPCA Assured or organic certified by Soil Association or Organic Farmers & Growers

Outcome measure: Low levels of lameness and low levels of helminths and low levels of anti-microbial use

Target should be set, which will requires standardised national metric and collection method.

Will require excellent land and flock management to achieve better health and welfare

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ⁱ <http://www.farmwel.org.uk/>

ⁱⁱ <http://oursankalpa.org/>

ⁱⁱⁱ https://publications.parliament.uk/pa/cm201719/cmselect/cmenvfru/870/87010.htm#_idTextAnchor078