

BVA response to the Farm Assurance Review

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 members, our mission is to represent, support and champion the whole UK veterinary profession. We are a professional body, and our members are individual veterinary surgeons. We take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

Consultation questions

3. Thinking of producers, retailers, food processors and customers, what does Farm Assurance provide, and are these attributes necessary? – if so, why?

UK farm assurance schemes provide customers with the opportunity to make sustainable, healthy and ethically informed choices about the food they buy, including the impact of food production on animal health and welfare. Assurance schemes also allow farmers to demonstrate that the food they have produced has met specific, independently certified standards at each stage of the supply chain from 'farm to fork'. These standards include animal health and welfare, food safety, stockmanship training and competencies, and environmental protection.

These attributes are necessary as they offer a route through the whole system to be better than the baseline required by law. They enable farmers to communicate with retailers and processors when they are working to high standards, and this can too be communicated to the consumer.

4. What are the most notable strengths and weaknesses of the current UK farm assurance inspection process?

The biggest strength of the current UK farm assurance inspection process is the fact that they actually exist in order to provide some level of scrutiny and assurance to consumers.

Some of the weaknesses involve the number of requirements and the tendency to limit the involvement of veterinary professionals in the process. The bureaucracy of the process can result in farmers turning away from the farm assurance schemes as there are limited benefits due to the compensation not being adequate to cover for the paperwork and bureaucracy involved, particularly where some of the standards are those required by law. Equally for consumers the standards suggest a 'higher level of, for example, animal welfare, when the standards demonstrated are merely those legally required in the UK and nothing more.

Another weakness is the fact that there are multiple farm assurance schemes, and this can make it complicated for consumers to understand and for producers to communicate.

5. How has the role of farm assurance developed over time, and where do you see this going in the future?

We would expect future farm assurance schemes to enhance health and welfare of animals beyond legal baselines, and to ensure veterinary professionals are involved in the process, so that we can continue to advocate for and improve animal health and welfare. We are concerned that the veterinary profession does not have a more formal role in many of the existing schemes – either in developing animal, and public, health and welfare requirements or monitoring compliance.

We would also expect to see how farm assurance schemes continue to drive up welfare standards in particular, reduce inappropriate medicine use and gain disease control. Farm assurance

schemes are already reducing antimicrobial use, and diseases such as BVD so we will expect this to continue. There could be opportunities to ensure that epidemiological principles are included so that these schemes provide the UK farming community with increased protection against endemic and emerging diseases, including zoonoses. A potential challenge, however, will be to align these schemes with future government policy in relation to subsidies, the animal health and welfare pathway and trade, especially in a post-Brexit context.

6. Only if appropriate, how many schemes do you belong to, or implement/ask for from suppliers - and which add the most value? Why is this the case?

The veterinary profession's first responsibility is to advocate for the best interests of animals and ensure as many kept animals as possible have a good life and all a humane death. We support these principles through our commitment to ensure that the food we consume and provide at the BVA is sourced from farm assured schemes¹

We have also developed an infographic which we developed as part of our #ChooseAssured campaign to encourage the veterinary profession and the public to choose farm-assured animal-derived food products. See our infographic here: <https://www.bva.co.uk/take-action/our-policies/farm-assurance-schemes/>.

Impacts and Improvements

7. Are there any unintended assurance scheme benefits for farmers and growers (e.g. bank lending, profitability, environmental management) and how could these benefits be enhanced?

Animal agriculture can be a significant contributor to positive societal outcomes such as human nutrition and livelihoods, land management and environmental stewardship. It can also contribute negatively to environmental degradation, climate change, habitat loss and waste. Assurance schemes should support farmers to highlight where they have worked to adapt animal production and farming practices to benefit these societal outcomes, which can improve public understanding and perception of farming.

The animals kept in UK farms are sentient, therefore ensuring their health and welfare is an important marker of social progress and is integral to a One Health agenda, with the government recognizing animal welfare as a public good¹. It plays a key role in achieving other sustainability objectives as expressed above. Some have noted that achieving good animal welfare is not always advanced as a policy objective in the sustainable development agenda, despite a growing moral imperative to do so and the utility value of healthy and happy animals in helping to achieve the UN Sustainable Development Goals².

8. How could farm assurance schemes in the UK be best improved? Could technology play more of a role?

The BVA has set up a list of priorities for farm animal welfare which we believe should be part of all assurance schemes. These are:

- **Lifetime assurance** – BVA believes that all farm assurance schemes should cover the health and welfare of the animal from birth to slaughter, known as 'farm to fork'. Whilst all farm

¹ <https://defra.farming.blog.gov.uk/2022/03/22/the-animal-health-and-welfare-pathway-towards-a-new-welfare-state-for-farm-animals/>

² <https://sdgs.un.org/>

assurance schemes play an integral role in promoting higher standards of animal health and welfare, we believe that all animals should have a good life from point of birth, as well as a humane death.

- **Welfare at slaughter** – BVA believes that all animals should be stunned before slaughter, and as close to the point of production as possible. If slaughter without stunning is still to be permitted, then any meat or fish products from this source must be clearly labelled so that consumers can fully understand the choice they are making when purchasing such products.
- **Veterinary involvement** – Expert input and advice from the veterinary profession in the development, implementation, and continuous review and improvement of farm assurance schemes is crucial to the value of those schemes in terms of animal health and welfare, public confidence, and producer/farmer buy-in.
- **Behavioural opportunities** – The ability of animals to perform certain behaviours can be important for achieving good animal welfare, and frustrated highly motivated behaviour can result in compromised welfare. The drive for production outcomes must not negatively or unduly negatively impact on behavioural opportunities, as not all natural behavioural outcomes are indicative of improved welfare, such as in the case of farrowing crates where the sow may crush piglets; or positive environmental outcomes, such as the decreased food conversion efficiency intrinsic in free range and out-door rearing systems. On-farm welfare outcome assessment is important in assuring that systems are balancing the ability to perform important behaviours with good health outcomes. Behavioural restriction is an important concern for many consumers.
- **Responsible use of antimicrobials and other medicines** – BVA strives for responsible prescribing and responsible use of veterinary medicines across the profession, industry, and in the wider context of One Health³. A reduction in the use of antimicrobials in animals can be achieved through improvements to animal health and welfare via disease prevention strategies, including improved animal husbandry and management. Technology can be used here to consistently monitor farm antimicrobial use. Farm assurance schemes have already played a key role in improving responsible antimicrobial use in UK agriculture.
- **Animal health and biosecurity** – biosecurity and measures taken to prevent the spread of disease amongst animals, humans and their surroundings are a crucial contributor to the high animal health and welfare of farm animals, as well the UK's biosecurity and food safety. Biosecurity also positively impacts upon human health, helping to prevent zoonoses generally, and other infectious diseases such as avian influenza, or endemic diseases such as bTB.
- **Technological opportunities** - for on-farm health monitoring use a variety of different methods e.g. cameras and automatic weighers. Outcomes can be measured by vets, farmers and in slaughterhouses based on flock/herd, laboratory, slaughterhouse data and audits.
- **Approach to sustainability and the environment** – consumers are encouraged to explore how the scheme incorporates elements of environmental stewardship, such as the carbon footprint of the production system and on farm conservation of biodiversity.

Farm assurance schemes can be improved by ensuring they meet all the above criteria. BVA also believes that there is ongoing work to be done in communicating the value of improved animal health and welfare, and of assurance schemes in achieving this, to producers, farmers, citizens, retailers and others, so that the links between investment, good health and welfare outcomes (for animals and farmers) and economic returns are understood. Engaging consumers is particularly crucial here, as informed citizens will help ensure their spending can be better directed

³ <https://www.bva.co.uk/media/1161/bva-policy-position-on-the-responsible-use-of-antimicrobials-in-food-producing-animals-1.pdf>

towards animal products which align with their own ethical and budgetary priorities. The Government must also ensure that there is a minimum standard associated with the environmental impact and “One Health”.

9. Who should be involved in the development of farm assurance schemes and their component standards?

The development of a farm assurance scheme should include all involved in the production, selling and processing of food products. It is important for the veterinary profession to continue being fully involved in the development of farm assurance schemes as it carries out an important and multifaceted role in the development, implementation and continuous review of farm assurance scheme standards. Veterinary professionals are involved across the farm assurance process, from establishing and evaluating the standards that farm assurance schemes require, to developing veterinary health plans with farmers to promote compliance and facilitating cost-effective stockmanship and husbandry practices, to delivering the animal health programmes and achieving the outcomes that underpin and are critical to each.

Relationships

10. What should the relationship be between farm assurance schemes and other voluntary assurance schemes (such as retailer/food processor led schemes or environmental accreditations such as LEAF?)

There needs to be dialogue about the basics between all the assurance schemes and they need to work coherently and ensure requirements are evidence based. They should also align where possible as this will create equivalent principles for everyone in the food system, simplifying the process for consumers and reducing workload as a result.

11. How effective is the relationship between farm assurance schemes managed separately in the devolved nations and UK-wide schemes?

It is crucial that there is equivalence / parity of outcome across the four UK nations given the interconnectedness of each in the food-supply chain and the shared vulnerability to under-cutting standards by cheaper imports from outside the UK, especially as the UK has one of the world’s highest standards of animal welfare. This is an area where labelling can play a crucial role, and it should be improved to make clear to consumers which part of the production process took place in which devolved nation.

12. Should there be a relationship between farm assurance standards and the compliance requirements for government-funded farm support payments?

Yes, to ensure there is consistency on the basics and to enable farmers to progress schemes that overlap with government funded support and government objectives. The Animal Health and Welfare Pathway has helped to provide some uptake for this. It is important that we are aligned across schemes, government and devolved nations in order to take a cohesive approach to animal health and welfare.

13. What advantages or disadvantages might there be from government or scheme ‘earned recognition’ (*earned recognition rewards those businesses who are regularly compliant with fewer visits, allowing for more attention on those less compliant*), for membership of assurance schemes and how best might such recognition be put into operation?

We are supportive of recognising participation in farm assurance schemes wherever possible, as

part of an “earned recognition” system. Farm assurance schemes allow producers to demonstrate that their food products, both animal and non-animal derived, have met specific, independently certified standards at each stage of the supply chain from farm to fork. Some of the advantages of the ‘earned recognition’ scheme include consistency of data.

14. How can standards be assured for food products that are not part of an assurance scheme? Are there measures that could be taken by government or other agencies to provide a level playing field between assured and non - assured products?

Standards for food products should be monitored by the appropriate statutory agencies – FSA, Local councils ensuring statutory compliance, while central government must ensure when completing trade deals that imports of food are held and assured to the highest health and welfare standards.

However, the government or other agencies doesn’t necessarily have to provide a level-playing field. It is important that the difference between assured and non-assured products is clear to consumers, including what is mandated, what is publicly managed and then what is industry/civil society led.

15. Who should bear the cost of assurance schemes and their related inspection regimes? What would be the justification for this allocation of cost?

Every stage of the production process should be responsible for its own costs, in the same way such schemes are applied to other industries. These costs should then appropriately be passed onto the consumer. This will encourage good explanation of the benefits of the scheme.

16. Should there be more help with training and development in helping farmers to comply with assurance schemes? Who should be responsible for the provision and funding of this training and development work?

The government should provide farmers with the funding of training and development to comply with an assurance scheme. Veterinary professionals should be an integral part of delivering training and on-going assistance in developing programs, ensuring compliance and monitoring effectiveness. Farmers should also be involved in the development of training.

Any training that is developed should also take place within the context of a system based holistic approach, with genuine engagement and understanding of how to effect change.

17. Should UK farm assurance schemes be comparable to their international counterparts? (note: many UK farmers and farm organisations believe that UK standards are “better/higher” than other countries and while there is some evidence to support this - do you believe it to be true/relevant?)

They should at least be comparable, and preferably encourage higher standards than our international counterparts. The UK is among world leaders in animal health and welfare standards. This should be championed and perhaps used to help contextualise the potentially higher costs associated with farm assured products and the typically lower costs associated with systems that do not prioritise animal health and welfare to the same degree.

It is important to note that almost three quarters (72%) of those surveyed in the UK claim to be

willing to pay more for products sourced from animal-welfare friendly systems⁴. However, this does not always translate to purchases at the till. If businesses were able to demonstrate their higher quality credentials to consumers, this may translate into purchases of these products.

Final views

18. Do you have any other final views or comments that would help the Commission in developing its recommendations?

In general, the outcome of farm assurance inspections is difficult to understand from the consumers' point of view. The Commission should explore ways of placing the outcome of an inspection on the public record – this is alluded to in Q8. This could also be reflected on product labels. Livestock registration procedures could be extended to a “license to keep livestock” contingent on participation in an assurance scheme.

It will be important for the outcomes of the review to be implemented consistently across the UK.

ⁱ <https://www.bva.co.uk/media/3322/bva-food-procurement-position-template.pdf>

⁴ <https://www.conservativeanimalwelfarefoundation.org/mandatory-labelling/animal-welfare-should-be-at-the-heart-of-any-government-mandated-labelling-system-according-to-new-report-by-conservative-animal-welfare-foundation/#:~:text=A%20Eurobarometer%20poll%20found%20that,to%20higher%20animal%20welfare%20standards.>