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Dear Alison

**NON-FORMAL CONSULTATION ON PROPOSALS TO REFORM THE ANIMAL WELFARE INSPECTION REGIME: FAWC RESPONSE**

FAWC welcomes the principle of extending risk based official inspections and achieving more efficiency in the animal welfare inspection routine and welcomes the opportunity to comment upon the proposals.

*Refining the AHVLA risk model used for allocating risk- based official inspections to claimants under cross compliance regulations.*

- 1. What is your opinion on requiring the inspection procedures of participating farm assurance schemes to be UKAS-accredited? What about smaller schemes for which it might not be economically viable to seek UKAS accreditation?*

Based on the evidence provided from the Warwick study, we support the principle of extending the risk criteria to include membership of schemes that are UKAS accredited. UKAS accreditation of certification bodies is an important criterion to ensure the impartiality and competence of the certification procedures. Since certification bodies normally operate in a very competitive environment and offer extremely good value to the livestock sector, we do not believe that UKAS accreditation should be seen as a significant barrier.

- 2. Do you know of any other farm assurance schemes or organic certification schemes not listed in Annex VI which have welfare standards in their scheme and so may be relevant for inclusion in the risk model?*

No

- 3. Do you think that scheme membership/certification should be included in the risk model on a whole farm basis? This would mean that farms with*

*assured/certified livestock will have a reduced chance of inspection for all livestock held, regardless of whether or not all livestock are assured/certified.*

We believe that this is a reasonable assumption especially if the further analysis demonstrates this.

4. *What are your opinions on the five other potential risk criteria listed for further consideration? Do you have any other suggestions for potential risk criteria?*

The five listed risk criteria are very interesting and worthy of further evaluation, although there are likely to be significant challenges in collecting the data. It is likely that other countries are exploring other potential criteria so there may be opportunities to discuss this with other countries.

Section C: Herd health scheme potential criteria would need further clarification. For example, paragraph 6.9 talks about health planning; however, this is unlikely to be a sensitive measure considering that all the major assurance schemes require some element of planning. Further work would be needed to define and collate farm level compliance with “better” health planning. One criterion of better health planning could be “pro-active” monitoring of health and welfare outcomes by the farm management. As an example, mobility scoring for lameness is being used proactively by some but not all dairy farms. For pigs, active participation in the BPHS abattoir monitoring scheme could be another example.

Section E: Retailer schemes may indeed be an indicator of lower risk. However, care must be taken as the requirements of such schemes are a) not always transparent, b) likely to fluctuate rapidly, and c) not likely to be UKAS accredited. In practice the main benefit of such schemes (especially in the dairy sector) may be the additional premium received. In this case receiving additional premium may be a better proxy measure for a lower risk score.

Other data source / criteria: Another data source could be welfare outcome assessment undertaken by schemes. For example laying hen farms are being assessed for feather loss by Freedom Food, Soil Association schemes and some retailers directly. Measures such as feather loss may be particularly useful, as farms with very limited feather loss are usually operating at very high management standards plus it does link with the justification for beak trimming.

5. *Are there any other points you would like to make in relation to the risk model?*

No

*Achieving efficiencies in the animal welfare inspection regime*

6. *Can you suggest further efficiencies in welfare inspections, where appropriate referring to the benefits and or/drawbacks of your suggestions?*

Nothing obvious

7. *What is your opinion on using FAS inspection data for official returns to the Commission?*

This would be a welcome development in principle. However, there are some important caveats. Firstly, there would need to be much improved working together between Defra, FA schemes and UKAS in order to ensure the competency, technical guidance and legal interpretation of FA schemes are equivalent to AHVLA inspections. Secondly, the additional value of FA assessments needs to be properly recognised by the food chain. For many schemes the competition between certification bodies has brought financial efficiency to the assurance process. However, it is important that this efficiency does not compromise quality of assurance. Placing additional requirements on farm assurance assessors without sufficient fee would compromise the reliability of scheme assessments

*8. Do you have other suggestions or ideas for encouraging better sharing of information?*

This consultation has usefully highlighted potential risk criteria that are worthy of further investigation and discussion. Whilst this informal consultation is welcome, repeating this process for all these criteria is not likely to be very efficient. Perhaps Defra should establish an informal group to proactively review such processes and other opportunities for working together. This would be more in line with the partnership concepts outlined in the new Animal Health and Welfare Board.

Yours sincerely

Professor Richard Bennett  
Chair, FAWC Ethics, Economics, Education and Regulation Standing Committee

cc. Professor Christopher Wathes, Chair, FAWC