

Response to the Defra consultation on a public sector food and catering policy for England

Who we are

1. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 19,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. We welcome the opportunity to respond to this consultation on a public sector food and drink catering policy for England.

Summary of our position

3. We strongly support a governmental food and catering sourcing policy which is centred on the protection of animal welfare and makes strong provisions for responsible and sustainable production methods. It should also help consumers to make decisions with regard to the sourcing of their food choices. We believe that consumers have a right to understand the provenance of the food they are purchasing so that it can help them to make an informed choice as to how to direct their spend towards higher animal health and welfare products based on their own ethical priorities.
4. We also welcome the proposal to increase the transparency of food supply chains which should be designed in such a way that it allows consumers access to the type of information that will allow them to make the above-mentioned decisions.
5. In our view, it is important that the Government leads by example when it comes to ensuring that food sourced for the public sector complies with high animal welfare standards and this consultation therefore provides an important opportunity to embed those principles further in the public conscience.
6. However, we are disappointed that the consultation fails to include proposals that all meat sourced for public sector catering must come from animals that have been stunned before slaughter. The exception for non-stun slaughter is solely for some religious communities, and not intended to cater for wider public consumption.
7. It is also important to allocate adequate resources to the monitoring and enforcement of the new standards when they come into force. As an example, we would like to highlight the work carried out by APHA and the Scottish Government egg marketing inspectors and poultry meat marketing inspectors that is required to ensure that labelling does reflect the reality of production as well as the key role played by FSA, FSS, and DAERA in safeguarding public health.
8. This work must include adequate monitoring of imported food of animal origin too and we would like to highlight the potential for issues being caused by the recently signed trade deal between the UK and Australia where animal welfare standards are below the standard applicable in the UK and expected by local consumers.
9. Additionally, we would like to highlight the potential challenges arising from a divergence of standards across the devolved administrations and the associated need for total transparency for consumers.

10. We would also like to draw your attention to our response to Defra's 2021 call for evidence on labelling for animal welfare in which we have provided more detailed information and proposals on several of the issue touched on in this consultation including international farm assurance schemes¹.

Part 1: Fair and transparent procurement guidance principles

11. We welcome the proposal that contracting authorities should demonstrate progress towards the aspiration that 50% of food spend is on food produced locally or to higher environmental standards. However, this target should also include higher animal welfare standards. Additionally, there should be incentives built into the principles to encourage the relevant authorities to exceed those standards.

Part 2: Government buying standards for food and catering services

12. It is important to highlight that the proposed standards require that all food must meet UK food and farming legislation, including animal welfare standards, or equivalent. However, the UK has recently agreed trade deals with several countries, including Australia which has animal welfare standards that significantly diverge from the UK. For example, extreme confinement systems for pigs and poultry are still permitted in Australia, specifically the Australian Model Code of Practice for the Welfare of Animals allows for the use of sow stalls². We are therefore concerned that the proposed guidance risks being undermined by current and future trade agreements.
13. The use of some hormonal growth promoters (HGPs) in beef is also approved in Australia. In the UK, the use of growth promoters is banned, and pharmacological hormones are restricted for clinical use only.
14. The standards also do not specify that all meat must come from animals that have been stunned before slaughter, unless slaughtered under the derogation for slaughter in accordance with religious rites. Consequently, it is possible for public services to procure meat from animals that have not been stunned before slaughter, for wider consumption. The derogation permits non-stun slaughter solely to cater for the needs of some of the UK's religious communities and is not intended to cater for wider public consumption.
15. We therefore would urge the Government to use the opportunity afforded by the review of the current standards, to specify that all meat must be sourced from animals that have been stunned before slaughter within these minimum mandatory standards. The only exception to this should be if there is a specific request to meet the needs of the UK's religious communities.
16. As a minimum, any meat from animals that have not been stunned before slaughter must be clearly designated as such, on the menu and in accompanying literature, in the spirit of Government buying standards on specifying the origin of meat and meat products.
17. Public sector bodies should also be discouraged from making non-stun meat the only available option for a particular category of meat eg all lamb dishes made with halal meat, even if the meat is labelled correctly. This would help to stop non-stun

¹ <https://www.bva.co.uk/media/4395/bva-agv-bvpa-and-svs-response-to-defra-call-for-evidence-on-labelling-for-animal-welfare.pdf>

² <https://api.worldanimalprotection.org/country/australia>

meat being consumed outside the UK's religious communities which require this, something which is not in line with the existing derogation. They should also be guided to offer plant-based alternatives to cater for mixed dietary requirements.

1. Food sourcing

1.1. Production standards

18. The draft guidelines allow the use of international assurance schemes to demonstrate compliance with the requirements. However, there currently is no consistent approach to assurance schemes and we would therefore urge Defra to explicitly specify acceptable schemes both at UK and international level. Current approaches to welfare labelling tend to emphasise production systems which do not, by themselves, have a clear relationship to welfare status eg. 'outdoor-reared', 'free-range'. This approach is insufficient – focusing on inputs alone (e.g. through method of production on-farm) oversimplifies animal health and welfare outcomes on-farm and does not provide an objective measure of health and welfare across the animal's life from farm to fork. Any assurance scheme should cover welfare standards across each stage of life (eg. breeding, rearing, transport, markets and slaughter) and provide lifetime assurance for the whole life of the animal (including parents).
19. BVA has produced a position on farm assurance schemes³ with seven guiding principles, which sets out BVA priorities for farm animal welfare and shows if these are addressed in different UK farm assurance scheme standards. However, our accompanying infographic⁴ also highlights the significant differences that exist between UK farm assurance schemes and which underlines the potential challenges posed by the use of international assurance schemes.

³ <https://www.bva.co.uk/media/3113/bva-policy-position-on-farm-assurance-schemes-31519.pdf>

⁴ <https://www.bva.co.uk/media/3767/bva-uk-farm-assurance-schemes-choose-assured-infographic-october-2020.pdf>

Below is a reference grid that sets out BVA priorities for farm animal welfare against what is addressed in the standards of different UK farm assurance schemes. Products may be assured by more than one of these schemes or an assurance scheme not addressed in this graphic. Please check the label of food products carefully.

As part of the #ChooseAssured campaign, BVA is encouraging the veterinary profession and the wider public to #ChooseAssured by purchasing UK animal-derived products that are farm assured. Through the campaign we're raising awareness of the great work of the UK's farm assurance schemes and the crucial work of vets within the schemes to safeguard high animal health and welfare.

*including farmed fish

	Farm Assured Welsh Livestock	Lion Eggs Code of Practice	Northern Ireland Beef and Lamb Farm Quality Assurance Scheme	Quality Meat Scotland	Red Tractor	RSPCA Assured	Soil Association
Please note that this list of the BVA's welfare priorities is not exhaustive and these priorities will be addressed and assessed differently across the different schemes. The level of welfare achieved across the different schemes may vary. For more detailed information about the different standards and requirements used by farm assurance schemes please visit their respective websites.							
Animals are stunned before slaughter	Assurance does not cover slaughter	Assurance does not cover slaughter	Assurance does not cover slaughter	✓	✓	✓	✓
Veterinary involvement Veterinary professionals are involved in livestock health planning and review	✓	✓	✓	✓	✓	✓	✓
Prohibit environments that substantially reduce behavioural opportunity Enriched cages for laying hens Farrowing crates for sows (pre-birth until weaning)	N/A – Scheme only applies to beef and lamb	Permits enriched cages for laying hens	N/A – Scheme only applies to beef and lamb	Permits farrowing crates for sows (pre-birth until weaning)	Permits farrowing crates for sows (pre-birth until weaning)	✓	✓
Support responsible use of antimicrobials	✓	✓	✓	✓	✓	✓	✓
Animal health and biosecurity Measures to protect animal health and prevent the spread of disease	✓	✓	✓	✓	✓	✓	✓
Lifetime assurance Animals spend their whole lives on an assured farm, livestock transport is assured i.e. standards assure the management of health and welfare during transportation and scheme has standards to ensure welfare at slaughter ⁵	Assurance does not cover slaughter	Assurance does not cover slaughter	Assurance does not cover slaughter	✓	Pigs and meat poultry only	All species except dairy – dairy calves can be sourced from non-assured farms	Assurance does not cover transport
Measures to protect the environment i.e. guidance on preventing environmental contamination, pollution and minimising waste	✓	✓	✓	✓	✓	Farmed salmon and trout only	✓

⁵Schemes may address some of these areas even if products are not lifetime assured.

Last reviewed: January 2019, Review date: 2022

20. Additionally, Defra should consider requiring public sector caterers to publicly display information about the assurance schemes used to certify ingredients.

Animal source foods

1.3. Animal welfare

21. We welcome the proposal that procurers should work with suppliers to identify higher welfare products that go beyond UK legislative standards. However, in order for this to become more than just a tick-box exercise, a system needs to be put in place to evidence that such discussions have taken place and if they do not lead to the sourcing of higher welfare products, the reasons why should be recorded. Such information should then be used to find ways of making higher welfare products more available and accessible.
22. We do not support the development and application of welfare standards based on inputs or methods of production alone and consideration should be given to welfare outcomes across the supply chain. The applied standards should span the whole life of the animal, each stage of life (eg breeding, rearing, transport, markets and slaughter), and be centred around the Five Domains model for animal welfare assessment⁵

⁵ Mellor, David J.; Beausoleil, Ngai J.; Littlewood, Katherine E.; McLean, Andrew N.; McGreevy, Paul D.; Jones, Bidda; Wilkins, Cristina. 2020. "The 2020 Five Domains Model: Including Human–Animal Interactions in Assessments of Animal Welfare" *Animals* 10, no. 10: 1870. <https://doi.org/10.3390/ani1010187>

2. Healthier more sustainable menu choices

2.2 Local and cultural engagement

23. We acknowledge that public sector bodies should have to take account of cultural, religious, and special dietary needs of consumers when considering their food offering. However, it is important to ensure that compliance with this requirement does not lead to breaches of the of the derogation that permits non-stun slaughter to serve the UK's religious communities. Public sector bodies should be made aware that supply of meat derived by non-stun slaughter should not be the standard option in meat dishes and that this would not be in the spirit of the terms of the derogation. The guidance should also be amended to highlight that plant-based meals can be a suitable alternative to cater for mixed dietary requirements. In our position on sustainable agriculture⁶, we have set out the research and evidence behind a less and better approach to meat consumption.

2.3 Animal source food origin labelling

24. We are supportive of the requirement to highlight the country of origin of animal source food. However, as we have set out above, animal welfare standards vary significantly across different countries, and we therefore do not view the use of a generic label stating that the product has been made with animal source food derived from outside the UK as sufficient. The individual countries should be named on the label and packaging. This would also discourage the sourcing of animal origin food where the original source of the food is no longer fully transparent.

⁶ <https://www.bva.co.uk/media/1181/bva-position-on-uk-sustainable-animal-agriculture-full.pdf>