

BVA Welsh Branch response to the draft Code of Practice for the Welfare of Pigs

May 2020

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters and the wellbeing of the profession.
2. BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.

Views on the style, layout and content of the code, including the information, advice and guidance (Question 1)

General views

3. We welcome the opportunity to comment on Welsh Government's draft Code of Practice for the Welfare of Pigs. We support the document in its aims to maintain and improve animal welfare standards, present clear guidance to facilitate compliance with animal welfare legislation and promote evidence-based best practice for all those responsible for safeguarding pig welfare.
4. There are a number of formatting issues which currently make the document difficult to read. For example, under Stockmanship and staffing, the title of the regulations box sits separately from the rest of the text and the box itself. The Code will be much clearer once the formatting has been reviewed and any issues have been resolved.
5. In 2018, we responded to the consultation for the code of practice for the welfare of pigs in England. We are concerned that any regional deviation from this code in wording and subsequent interpretation may lead to confusion for farmers, vets and other stakeholders, particularly as many operate across the devolved regions. We are pleased to see that the proposed code is similar and would strongly recommend that any updates be mindful of this concern.
6. We welcome the code's recommendations to seek appropriate veterinary advice where relevant and ensure that veterinary advice is available when needed. We strongly support recommendations for owners and keepers to work collaboratively with their veterinary surgeon to produce Farm Health and Welfare plans, carry out routine animal-based measures to monitor welfare and identify strategies to prevent and manage tail biting. However, we recommend further refinement of the code in order to avoid any unintended consequence for the health and welfare of pigs. These refinements are set out below.

Preface

7. The text should clarify that owners and keepers can achieve what the document sets out with relevant advice and expertise from appropriately qualified professionals, such as their veterinary surgeon, as opposed to requiring that owners and keepers possess all the skills listed in the document themselves, in isolation.

Health and Welfare Plan

8. We strongly support recommendations for owners and keepers to work collaboratively with their veterinary surgeon to produce Farm Health and Welfare plans, however we would also like the document to emphasise the importance of stockmanship training and the training of staff to improve direct interactions with pigs.

Loading, unloading and transport

9. To strengthen this section of the document, we strongly recommend that the code should require that all third parties and owner/keepers responsible for the transport of pigs are familiar with the Humane Slaughter Association's guidance on the [Transport of Livestock](#) and our position on the [welfare of livestock during transport](#).

Animal-based measures

10. We support the animal-based approach. From an animal health and welfare point of view, it is not sufficient to carry out a tick-box exercise in terms of inputs. Evidence based indicators of positive welfare should be incorporated into welfare outcome assessments when possible, as promoted by the Farm Animal Welfare Committee (FAWC)'s "good life" framework¹. For example, behavioural opportunity for animals can be a key differentiator between some assurance schemes, which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes. The standardised assessment of health and welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct assessment.
11. To improve clarity and understanding, consideration should be given to using the term "outcomes-based" rather than "animal-based". "Outcomes" contrasts more clearly with the "inputs" mentioned in paragraph 46, and reflects the language being proposed for post-CAP agricultural policy in the recent "Sustainable farming and our land" consultation.

Lameness and limb lesions

12. Paragraph 57 reads: *"Pigs that are unable to walk independently without pain and those that have a severe open wound or prolapse are considered unfit to transport. Sick or injured animals may be considered fit for transport if they are slightly injured or ill and transport would not cause additional suffering: in cases of doubt veterinary advice should be sought. If a lame animal does not respond to treatment following veterinary advice, it must be humanely killed on farm as soon as possible rather than leave it to suffer. See paragraphs 62 to 66."*
13. We consider that making euthanasia a requirement after poor response is unjustified – it would be more appropriate for the paragraph to read 'seek further advice from the veterinary surgeon or consider culling'.

On farm killing

14. There are many other sources of information on this very important area of pig welfare eg those from the [Humane Slaughter Association](#). We recommend that these are referenced in the document.

Accommodation

15. Within the actual regulations extract –(c) see other pigs, except- (i) where the pig is isolated for veterinary reasons; or (ii) in the week before the expected farrowing time and during farrowing, when sows and gilts may be kept out of sight of other pigs;
16. Since these Codes are to be applicable to all keepers of pigs, there needs to be guidance to pet pig keepers about the keeping of single pet pigs as can commonly be the case – the regulation as it stands does not allow this.

General

17. At paragraph 73 we would recommend the following small change in wording to ensure that the value of veterinary advice in terms of advising on appropriate accommodation is clearly articulated and opportunities to safeguard animal welfare are seized: 'Owner/keepers should seek appropriate welfare advice from a veterinary surgeon and technical advisor when new facilities are to be constructed or existing facilities are modified.'

Mutilations

¹ Farm Animal Welfare Committee (FAWC) (2009). Farm Animal Welfare in Great Britain: Past, Present and Future. FAWC

18. We strongly agree that mutilations should only be carried out having sought appropriate advice on possible alternative interventions in each case and not as a routine practice. The code should also reference that they should only be carried out to improve the welfare of pigs and that they must be undertaken by a trained and competent person.

Managing and reducing the risk of tail biting

19. We believe that the management and prevention of tail biting, which is a complex and multifactorial problem, are essential goals, given their impacts on animal health and welfare and the reputation of the pig farming industry. We are supportive of the information included in the code, and pleased to note that environmental enrichment is not being portrayed as a panacea, nor have environmental adjustments been identified as consistently or universally successful.

Suggested addition to the code

20. We would recommend that the draft code also considers the farming and keeping of wild boar. In many cases, wild boar are shot on farm in an approved farm slaughter facility before being transported to an approved slaughterhouse. These processes result in additional handling risks and potential for escapes that could result in the development of feral populations. The draft code would present an opportunity to recognise and address these risks.

Dissemination of the new code

21. Welsh Government should work collaboratively with the professional and representative organisations of the stakeholders outlined at the start of this consultation to promote the code across their various communications channels, aiming to reach keepers and owners directly and those that work closely with these groups to ensure the high welfare of the pigs under their care. Further, consideration should be given to extracting certain sections of the Code of Practice, eg strategies for identifying, managing and preventing tail biting and the table on suitability of materials for providing enrichment and how this information could be meaningfully presented as quick reference resources to facilitate compliance from owners and keepers. In addition, thought should be given as to how to reach owners who keep pigs as pets with the messaging and best practice that is set out in the draft code.

Impact on Welsh language (Question 2)

22. BVA is aware of the Welsh language act and the importance of the Welsh language in Welsh communities, particularly in rural areas likely to be most affected by agricultural policy. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication and it is important for animal health and welfare that farmers in all parts of Wales are able to access information and guidance in their chosen first language.