

BVA, BCVA, BVPA, GVS, PVS, SVS and VDS response to EFRA committee inquiry on public sector procurement of food

24 August 2020

Introduction

- 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.
- 2) The following species and sector-specific divisions have contributed to and co-badged this response:
 - The **British Cattle Veterinary Association (BCVA)** is a specialist cattle division of the BVA comprising 1,250 members, of whom approximately 950 are practising veterinary surgeons working with cattle in farm animal veterinary practice.
 - The **British Veterinary Poultry Association (BVPA)** is an active non-territorial division of the British Veterinary Association. The objective of the BVPA is to further the knowledge of its members, who are drawn from academia, research, government, commerce and practice, by holding educational and technical meetings. The Association also offers objective science-based advice and comment on issues affecting its members and the poultry industry in general.
 - The **Goat Veterinary Society (GVS)** is a division of BVA and has approximately 300 members, including veterinary surgeons with a specific interest in goat health and welfare, but also has a significant "non-veterinary" membership including owners and farm personnel from across the entire spectrum of goat keeping in the UK.
 - The **Pig Veterinary Society (PVS)** is a specialist division of the British Veterinary Association. The membership of PVS includes veterinary surgeons and scientists who work in the pig sector, and the Society aims to assist its members in their professional lives by ensuring they have access to the latest information with regards pig health and production. PVS also represents the membership at a national level, making sure that pig welfare is a priority considering the latest research with regards health and management on farm.
 - The **Sheep Veterinary Society (SVS)** promotes sheep health and welfare as a specialist division of the BVA. While most of its 700 members are vets, many are drawn from all sectors of the sheep industry.
 - The **Veterinary Deer Society (VDS)** - The Veterinary Deer Society (VDS) was established in 1981 with the object of aiding those vets interested in deer to exchange information more easily. While the original impetus for the Society came from the growing deer farming industry, many members are more involved with park and wild deer, zoological collections, and involved in research into diseases of deer.
- 3) We welcome the opportunity to provide evidence to this inquiry on public sector food procurement. As the UK leaves the EU, the UK government has a real opportunity show leadership by ensuring animal health and welfare, environmental outcomes and investment in UK sustainable animal agriculture is prioritised in public sector food procurement.

How could the Government Buying Standards be improved?

Procure animal-derived products that are assured by UK farm assurance schemes

- 4) We note that in current Government Buying Standards all food served must be produced in a way that meets UK legislative standards for food production and animal welfare, or equivalent standards.
- 5) To recognise the high standards in UK agriculture, and value UK producers, the public sector should be encouraged to 'Buy British' and Government Buying Standards should specify that, where possible, food served should be produced in the UK. In addition, there is a real opportunity to show leadership in the Government Buying Standards by encouraging the public sector to purchase UK produce that is assured by a UK farm assurance scheme. Where it is not possible to procure food produced in the UK, as outlined in the existing Government Buying Standards, all food served must be produced in a way that meets UK legislative standards for food production and animal welfare, or equivalent standards.
- 6) UK farm assurance schemes promote high standards of animal health, welfare and environmental stewardship and provide guarantees that animal-derived products have met independently certified animal health and welfare standards at each stage of the supply chain, including welfare at slaughter and pre-slaughter stunning.
- 7) BVA has produced a [position on the value of UK farm assurance schemes](#) and a [supporting #ChooseAssured: UK Farm Assurance schemes infographic](#), which sets out BVA priorities for farm animal welfare and shows if these are addressed in different UK farm assurance scheme standards .
- 8) We have also produced seven guiding principles for individuals considering their own approach to the selection of farm assured UK produce. These principles could equally be applied to the Government's public sector food procurement considerations:
 - **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 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 from this source must be clearly labelled so that consumers can fully understand the choice they are making when purchasing such products. Consumers should consider which scheme requires pre-stunning, and what requirements, if any, there are in relation to transport to slaughter.
 - **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. Consumers may wish to consider whether the scheme is independently certified, underpinned by veterinary expertise, and committed to continuous improvement.
 - **Behavioural opportunity** – The ability for animals to perform certain behaviours can be important for achieving good animal welfare, and frustrating highly motivated behaviour can result in compromised welfare. In production systems where behavioural opportunities are reduced, there are often trade-offs with other welfare and production outcomes. 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 Health](#). 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. Consumers are encouraged to consider whether the scheme supports responsible use of antimicrobials, and what requirements are incorporated to help prevent the need for prescribing.
 - **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 as a whole. Consumers are encouraged to consider how the scheme promotes effective biosecurity measures and the reduction of disease risks, in collaboration with a veterinary surgeon.
 - **Approach to sustainability and the environment** – consumers are encouraged to explore how the scheme incorporates elements of environmental stewardship, such as carbon footprint and conservation of biodiversity.

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Ensure all meat and meat products have been stunned before slaughter

- 9) All animals should be effectively stunned before slaughter to render them unconscious and therefore insensible to pain, distress, fear and suffering. It is a statutory requirement for all animals to be effectively stunned before slaughter in the UK. Scientific evidence^{1, 2, 3, 4} shows that slaughter without effective pre-stunning causes animals
- to feel the pain of the neck cut;
 - to experience a delay in loss of consciousness and therefore a delay in insensibility to pain, fear and distress (up to two minutes in cattle⁵); and
 - to be likely to experience pain, distress, fear and suffering before and during the cut, and during bleeding out while still conscious.
- 10) While it is a statutory requirement for all animals to be effectively stunned before slaughter in the UK, EU Council Regulation (EC) No 1099/2009 on the Protection of Animals at the Time of Killing allows Member States to apply a derogation to permit slaughter without stunning for slaughter in accordance with religious rites. The UK administrations apply this derogation in their Welfare of Animals at the Time of Killing regulations and permit non-stun slaughter when animals are killed by the Jewish method (Shechita) for the food of Jews by a Jew who is licensed by the Rabbinical Commission and holds a certificate for that purpose, or by the Muslim method (Halal) for the food of Muslims by a Muslim who holds a certificate for that purpose.
- 11) This derogation only applies to the legal requirement for animals to be stunned before slaughter. For all other slaughter operations, animals slaughtered in accordance with religious rites must comply with requirements to protect animal health and welfare as set out in the UK Welfare of Animals at the Time of Killing regulations.
- 12) As it is a statutory requirement for all animals to be effectively stunned before slaughter in the UK, public services should only procure meat and meat products from animals that have been stunned before slaughter, unless there is a specific request to meet the needs of the UK's religious communities (as per the derogation for slaughter in accordance with religious rites).
- 13) At present, the Government Buying Standards state that "All food served must be produced in a way that meets UK legislative standards for animal welfare, or equivalent standards", however the standards 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, which is not in the spirit of the derogation. Therefore, there is an opportunity to specify that all meat must be 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 (as per the spirit of the derogation) and there should be a mechanism to permit this. 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 GBS standards on specifying the origin of meat and meat products.

What should the Government's priorities for future food procurement be?

Prioritise animal health and welfare

- 14) Ensuring high standards of animal health, animal welfare, public health and food safety and responsible antibiotic use should be at the heart of the Government's approach to future food procurement. As outlined above, this can be achieved by championing UK agriculture, and ensuring that all animal derived products are assured by a UK farm assurance scheme, as well as stunned before slaughter. Our seven guiding principles provide a good framework for future considerations regarding the procurement of animal-derived products:

¹ Farm Animal Welfare Council., 2003. Report on the Welfare of Farmed Animals at Slaughter or Killing, Part 1: Red Meat Animals. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/325241/FAWC_report_on_the_welfare_of_farmed_animals_at_slaughter_or_killing_part_one_red_meat_animals.pdf .

² DIAREL Project, K.vol Holleben et al., 2010. Report on good and adverse practices – Animal welfare concerns in relation to slaughter practices from the viewpoint of veterinary sciences. Available at: https://www.vetjournal.it/archivio_pdf/2010/4069.pdf

³ European Food Safety Authority, 2004. Opinion of the Scientific Panel on Animal Health and Welfare on a request from the Commission related to welfare aspects of the main systems of stunning and killing the main commercial species of animals. Available at: <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2004.45>

⁴ Mellor DJ, Gibson TJ, Johnson CB., 2009, [A re-evaluation of the need to stun calves prior to slaughter by ventral-neck incision : an introductory review](#). N Z Vet J. 2009 Apr;57(2):74-6. doi: 10.1080/00480169.2009.36881.

⁵ Farm Animal Welfare Council., 2003. Report on the Welfare of Farmed Animals at Slaughter or Killing, Part 1: Red Meat Animals. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/325241/FAWC_report_on_the_welfare_of_farmed_animals_at_slaughter_or_killing_part_one_red_meat_animals.pdf .

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- Lifetime assurance
- Welfare at slaughter (pre-slaughter stunning)
- Veterinary involvement
- Behavioural opportunity
- Responsible use of antimicrobials and other medicines
- Animal health and biosecurity
- Approach to sustainability and the environment

How should the Government support these priorities in the negotiation of new trade deals?

15) A new trade agreement could allow imports that fail to meet these the UK's high standards onto the UK market. Within the UK these goods would become indistinguishable from UK produce. Therefore, in the negotiation of new trade deals, the UK must safeguard its high reputation for animal health, animal welfare, and food safety. In all trade agreements it negotiates, the government must secure the inclusion of equally high standards of animal health, animal welfare, public health and food safety and responsible antibiotic use.

To what extent should the public sector be encouraged to “Buy British”?

16) As outlined above, we strongly support encouraging the public sector to buy UK produce and championing the high standards of UK agriculture, in particular by procuring UK farm assured produce. Government Buying Standards should be amended to reflect this.

17) In addition, we would also welcome a government-led education campaign, supported by agricultural, animal health and welfare, and food stakeholders, to encourage all UK consumers, both public sector services and individual consumers, to buy farm assured British produce, and understand the positive animal health and welfare, and environmental, impacts of doing so.