

BVA and BVPA response to Red Tractor 2021 standards review

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, animal welfare, public health, regulatory issues and employment matters.
- 2) 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
- 3) We support the ongoing work of the UK's farm assurance schemes, which enable customers, as citizens, to make sustainable and ethically informed choices about the food products they buy and the impact of these products on animal health and welfare.
- 4) The veterinary profession 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, high standards of animal health and welfare, environmental sustainability, and facilitating cost-effective stockmanship and husbandry practices.
- 5) In addition, the veterinary profession has a key role to play in informing and educating the public with regard to the value and provenance of animal derived food. As such, BVA has a responsibility to assist members to understand different farm assurance schemes and to signpost the public, in a professional and ethically justifiable way, towards those that promote higher animal health and welfare. With this in mind, we have developed our [#ChooseAssured campaign and UK farm assurance schemes infographic](#) to raise awareness of how farm assurance scheme support animal health and welfare, and encourage consumers to purchase farm assured produce.

Overarching views

- 6) We welcome the opportunity to respond to this review of Red Tractor's farm standards. We are broadly supportive of the proposed changes to Red Tractor's standards to improve animal health and welfare across farm animal species. For more detailed commentary on individual standard changes for pigs, cattle and sheep please refer to the detailed responses submitted to this consultation by our specialist-species divisions.
- 7) Overall, we consider that the direction of travel of the proposed changes align well with BVA's underpinning priorities for farm animal welfare, which we set out to assist consumers when considering the UK's different farm assurance schemes. Our priorities for farm animal welfare cover:
 - **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 slaughtered 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 whether the scheme requires pre-stunning to be performed, and what requirements, if any, there are in relation to transport to slaughter. [Read the BVA position on the welfare of animals at slaughter in full.](#)

- **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 livestock 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. [Read the BVA position on the responsible use of antimicrobials in food producing animals.](#)
- **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. [Read the BVA position on sustainable animal agriculture in full.](#)

- 8) We welcome efforts to bring Red Tractor standards in line with the most up to date legislation, codes of practice and scientific evidence to support better animal health and welfare, and provide consumers with assurance from farm-to-fork. As Red Tractor standards are further developed, we would welcome work to explore the feasibility of lifetime assurance across species.
- 9) In addition, we recognise that from an animal health and welfare point of view, it is not sufficient to carry out a tick-box exercise in terms of inputs. We therefore support the use welfare outcome assessment in assurance schemes as a tool to drive continuous improvement of animal management and husbandry practices, in turn promoting high animal health and welfare. The standardised assessment of welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct picture of animal welfare. 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" framework. Behavioural opportunity for animals can be a key differentiator between some assurance schemes and is linked to the potential for good animal health and welfare outcomes.
- 10) A welfare-outcomes approach also contributes to informed considerations of the advantages and disadvantages of different production systems, assisting producers and consumers to consider how well a production system holistically meets an animal's health and welfare needs. It is important to avoid oversimplification when considering how different production systems address animal health and welfare needs and recognise that welfare outcomes are not solely dependent on the type or size of different production systems.
- 11) We would therefore welcome additional use of welfare outcome assessment across Red Tractor's farm animal standards, including at slaughter.

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Specific views on standard changes

12) As outlined above, for more detailed commentary on individual standard changes for cattle, sheep and pigs please refer to the detailed responses submitted to this consultation by our specialist-species divisions.

General comments

13) More broadly, across all species standards we particularly welcome the following areas that have been identified and addressed as part of the review:

- Additional emphasis on health and welfare planning and performance reviews in conjunction with a vet.
- Additional emphasis on the responsible use of all antimicrobials including antibiotics and antiparasitics. We strongly agree that Red Tractor should make it a requirement for the annual collation of antibiotic data to be uploaded to the AHDB Medicine Hub when the system is available. Improved data capture, analysis, dissemination and benchmarking of antibiotic use are required across all sectors. It is essential that there is a greater focus on improving surveillance and the flow of information and communication between farmers, vets, labs and national bodies so that all parties can get a better understanding of disease incidence, medicines use and vaccine use, which will improve decision making to tackle AMR. [Read the BVA position on the responsible use of antimicrobials in food producing animals in full.](#)
- Additional emphasis on the appropriate handling of livestock. However, it is important to carefully consider that listing unacceptable behaviours may result in the misconception that behaviours not listed are acceptable when they may not be.
- Clarification that all calf procedures must be carried out with pain relief, and only husbandry procedures detailed in the health plan should be carried out. [Read the BVA and BCVA position on analgesia in calves in full.](#)
- Clarification that dairy members must have a written breeding and management policy in place and implemented so that there is no routine euthanasia in calves. [Read the BVA position on surplus male production animals in full.](#)
- Linking welfare outcomes to dairy standards.
- Amendments to poultry health and welfare standards to ensure consistency across poultry species and improve enrichment, welfare during transport, housing and shelter facilities, and data collection on chick culls for each hatching day.
- Amendments to pig health and welfare standards to ensure there are appropriate systems of monitoring and managing pig health and welfare, annual veterinary assessment of staff competence in euthanasia and strengthened enrichment requirements.

Proposed changes to chicken standards

14) Below are BVPA comments on specific some of the specific standard changes that have been proposed for chicken:

- **AH. 1.1: Only breeds acceptable to the Scheme can be used**
Broiler growth is a function of nutrition and genetics. The marketplace looks for free range birds at 2.3-2.8kg live weight. Free range birds cannot be processed before 56 days therefore there is no incentive for the industry to use birds that grow too fast. In the wake of Brexit, it is essential that the breeds used are not too restrictive as demand for free range birds can rise faster than the breed companies can produce progeny from slower growing breeds.
- **AH.4.1: Environmental enrichment must be provided from day 1 at the latest**
Enrichment objects can cause chicks to huddle around them during the first few days of life impeding chick feed and water intake. This will compromise the chick health and welfare. We would propose that enrichment is not mandatory until day three.
- **AM.8.1: Prophylactic administration of antibiotics is not permitted**

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We strongly support this standard. However it is important to emphasise that there should be an allowance for metaphylaxis in order to safeguard the health and welfare of birds. For example, if there is a parent flock health issue that is affecting the chicks, not treating the chicks in this situation would compromise their welfare.

- **AH.10.5.b -Testing records with date of testing; result of testing are retained for at least 5 years and communicated to the hatchery; a positive test will be considered to be a field strain infection unless laboratory testing on the isolated Mycoplasma shows this is caused by a vaccine strain**

BVPA members have concerns about the impact on small companies of having to destroy a Mycoplasma gallisepticum parent flock. Many affected flocks can go on to have healthy progeny when correctly managed. It was pointed out that Mycoplasma strains vary in pathogenicity and some Mycoplasma synoviae strains can be more pathogenic than Mycoplasma gallisepticum. If Mycoplasma free parent flocks are to be achieved then ideally the industry would work to ascertain the prevalence of Mycoplasma gallisepticum and Mycoplasma synoviae in the industry then work with veterinary colleagues to create an eradication programme.

Proposed changes to turkey standards

15) Below are BVPA comments on some of the specific standard changes that have been proposed for turkey and additional comments on some of the standards more widely:

- **HF.5.1. Lighting follows a 24 hour rhythm**
This standard should include reference to previous wording from Quality British Turkey standards AW 7.2 'The period of darkness may be removed in the days immediately before slaughter.'
- **AH.9.j Dislocation of the neck is used only where immediate culling is required and is limited to a maximum of 70 poults by any one operator**
This standard should specify the time frame in which this applies eg per day or per shift.
- **AH.10.5 Flocks must be tested to determine Mycoplasma gallisepticum and Mycoplasma synoviae status**
Mycoplasma meleagridis should also be considered as part of this standard as an important and perirenal hemorrhage syndrome (PHS)-relevant pathogen in turkeys.
- **Structure of animal health standards**
The bullets in this section are out of sequence (AH.10 sits between AH.3 and AH.4, before a separate section of AH.10 starts after AH.9)
- **Hatchery section**
We note that this section omits several points that had previously been included in the Quality British Turkey Standards, including: temperature records and alarms; and sexing and grading. We would suggest these are incorporated.
- **Biosecurity (BI.1 and BI.2)**
Unlike the Quality British Turkey standards, this section does not require a declaration of the period of time since their last contact with poultry. We would suggest that these are incorporated.

Proposed changes to duck standards

16) Below are BVPA comments on some of the specific standard changes that have been proposed for duck and additional comments on some of the standards more widely:

- **Housing and shelter**
We agree with the supplementary document that if changes are being made regarding lighting and windows this should be evidence based.
- **Refrigerated medicines**

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We note that the standards stipulate temperature checks are carried out twice a week. However to be compliant with Summaries of Product Characteristics (SPCs) and conditions of use, temperature loggers and alarms are also required.

- There is mention of adhering to meat withdrawal times, however there should also be mention of egg withdrawal times for breeding stock.
- There is an assumption made that 50% of used water is for bathing, we would welcome clarification as to the evidence used to underpin this statement.

Communication of changes to consumers

- 17) We consider that there is ongoing work to be done in communicating the value of improved animal health and welfare, and of UK 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), food safety, environmental sustainability, and economic returns are understood. Engaging consumers as informed citizens will help ensure their spend can be better directed towards animal products which align with their own ethical and budgetary priorities.
- 18) We would therefore welcome further information as to how the planned revisions and changes to animal health and welfare standards will be communicated to consumers.