BVA AND VPHA JOINT CONSULTATION RESPONSE TO DEFRA’S PROPOSED NEW CODE OF PRACTICE FOR THE WELFARE OF PIGS

1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 17,000 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) The Veterinary Public Health Association (VPHA) is a division of BVA and is committed to the protection of the consumer and the environment as well as to the promotion of animal welfare. VPHA currently has over 300 members many of whom work as Official Veterinarians in slaughterhouses dealing with both public health and animal welfare issues.

3) We welcome the opportunity to comment on Defra’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) We are broadly supportive of the response to the draft code of practice that has been submitted by the Pig Veterinary Society (PVS) and in the following submission we outline areas for further consideration, which have also been highlighted by PVS as species experts.

5) Question 1: Do you agree that the new statutory code (provided in draft as part of this consultation) provides improved, up-to-date guidance to owners and keepers on how to comply with the relevant farm animal welfare legislation?

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 and the provision of relevant guidance for all forms of pig keeping within the UK in order to avoid any unintended consequence for the health and welfare of pigs. These refinements are set out below.

6) Preface
We would recommend that the phrase ‘all those who care for pigs’ is amended to ‘all
those with ultimate responsibility for the care of pigs’ to avoid confusion. The text should also 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.

7) Health and Welfare Plan
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.

8) Disease Control and Biosecurity
For improved impact and emphasis, consideration should be given to shortening this section into key themes, which are supported by the more detailed information included in this section as an Appendix at the end of the document. Further, we would recommend that the emphasis on this section is shifted from ‘limiting’ disease risk, to ‘minimising’ disease risk in consultation with the veterinary surgeon. PVS have made a number of specific comments regarding the achievement of good biosecurity which we would support, and we would also recommend that producers should not only check on the provenance of stock deliverers and removers but have regard to the state of cleanliness of transport vehicles and ensure that the haulier is compliant.

9) Inspection

27. The health and welfare of animals depends on them being regularly inspected by the owner/keeper or a member of staff. For all pigs, inspections must be at least once per day. However there may be some occasions where more frequent inspections are necessary, for example, at farrowing and pigs in sick pens.

As the legal requirement for inspection is once per day, it would be useful for the Code to provide further guidance as to what ‘more frequent’ means and when this would apply.

30. Owners/keepers should be able to anticipate problems or recognise them in their earliest stages and, in many cases, should be able to identify the cause and put matters right immediately. Recording incidents suggesting a health or welfare concern, in addition to minimum legal records requirements on mortality and medicines, may help in this.

We strongly support that additional records on mortality and medicines will help owners and keepers to take prompt and appropriate action.

In addition, we would suggest that paragraphs 33-36 include reference to the
10) Loading and unloading on farm
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.

11) Marking

46. Tattooing can only be carried out either using tattoo forceps on the ear, or by using slap marking equipment (applied by mechanical force or compressed air), with the full herd mark visible to each front shoulder area of the pig only (and not to bony areas, such as the spine or the belly areas). Tattooing of the live pig is only permitted for identification or management purposes and should be restricted to minimum interference with the skin in order to create the animal’s identity. A decorative tattoo applied to the skin of a live pig is not a permitted procedure.

We would recommend the rewording of this section to ensure clarity in line with PVS suggestions and to reflect differing legislation across the devolved regions of the UK.

12) Body condition scoring
We would recommend the revision of this section in line with the PVS response submitted to this consultation.

13) Lameness and limb lesions
65. If a lame animal does not respond to the veterinary surgeon’s treatment, it must be culled rather than leave it to suffer. If lame animals cannot be transported without causing them more pain, owners/keepers are required to kill (cull) them on the farm. See paragraphs 70 to 77. Pigs that cannot stand up unaided or cannot bear their weight equally on all four legs when standing or walking should not be transported off the premises.

In line with the PVS response, 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’.

14) On farm killing
As per the PVS response, this section is very specific when there are many other sources of information on this very important area of pig welfare eg, those from the Humane Slaughter Association.
15) **Accommodation**

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;

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**

At paragraph 83 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 buildings are to be constructed or existing buildings modified.'

**Feed, water and other substances**

100. All pigs need a balanced daily diet to maintain full health and vigour, and any changes in diet should be planned and introduced gradually. Pigs must not be fed kitchen waste. See the Annex.

This paragraph and the code of practice document as a whole should foreground the ban on feeding kitchen waste to pigs and take the opportunity to highlight that this offence can lead to prosecution.

16) **Mutilations**

We strongly agree that mutilations should only be carried out to improve the welfare of pigs and that they must be undertaken by a trained and competent person.

As PVS highlight in their submission, this section of the Code should highlight the legislation and husbandry surrounding mutilations, but also acknowledge that there are circumstances where they are required.

Further, we recognise the concerns highlighted by PVS that the draft code places a disproportionate emphasis on enrichment material, whilst, as the draft code itself recognises, tail biting is a multi-factorial issue and should be reflected as such in the document. We are currently working with PVS to develop a joint position on tail biting.

17) **Pigs kept in outdoor husbandry systems**

As a large proportion of the national herd is outdoor reared, we are concerned that this section of the code is disproportionately small and should be further developed.

**Accommodation**
186. All outdoor accommodation used, including arcs and huts, should be liberally provided with bedding and have a warm, draught-free lying area. This is especially important for the sow and litter at farrowing, during the suckling period and for newly weaned pigs.

Liberal use of bedding in farrowing arcs is contraindicated in the hot summer months since this actually leads to poorer pig welfare. This should be better captured in paragraph 186.

18) **Farrowing sows and piglets**

195. In hot conditions, lactating sows may be prompted to leave the arc to seek more comfortable conditions outside, effectively abandoning her litter for long periods of the day. Owners/keepers may need to consider alternative solutions to allow the sow to comfortably feed her piglets in a cooler environment and ensure piglets have access to water. Farrowing arcs should be insulated and have provision for some degree of extra ventilation such as manually controlled flaps.

As this stands this would mean that uninsulated arcs are not permitted, which would not be appropriate in all circumstances. We would suggest that this paragraph should encourage producers to consider means of alleviating heat stress in farrowed outdoor sows by means such as use of insulated arcs, painting huts white, having rear ventilation flaps, and an appropriate amount of straw usage. It is also linked with point 186 above where an appropriate amount of bedding should be provided in order to encourage the sow to use her arc and not abandon her litter.

19) **Wild boar farming**

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.

20) **Question 2: Do you agree that the new statutory code reflects the latest scientific and veterinary knowledge?**

We believe that effort has been made to ensure that the code reflects the current state of knowledge in this area. However, as outlined above and in the PVS response to this consultation there are some areas of the code that require further refinement to bring the code in line with current knowledge and practices.

We believe there is a disproportionate emphasis on indoor rearing and outdoor rearing systems should be better addressed in the document to ensure optimal pig welfare across the board.

21) **Question 3: In what ways do you think the new statutory code will reduce**
industry’s ongoing costs in complying with legislation? Can you quantify this?
Question outside of our remit as representative bodies for the veterinary profession.

22) **Question 4**: In what ways do you think the new statutory code will reduce industry’s ongoing costs in complying with legislation?
Question outside of our remit as representative bodies for the veterinary profession.

23) **Question 5**: Do you agree with the estimate of three hours for owners and keepers of pigs to become acquainted with the content of the new statutory code?
Question outside of our remit as representative bodies for the veterinary profession.

24) **Question 7**: What do you think is the most effective way for Government to make owners and keepers of pigs aware of the new statutory code?
The 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.