BRITISH VETERINARY ASSOCIATION RESPONSE TO THE REVIEW OF RED TRACTOR FARM ASSURANCE STANDARDS

Introduction and background

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 16,000 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. We appreciate the opportunity to contribute to this consultation.

2. In producing this consultation response, we have consulted with the Association of Government Veterinarians (AGV), Veterinary Public Health Association (VPHA), Sheep Veterinary Society (SVS), British Veterinary Poultry Association (BVPA), Veterinary Deer Society (VDS), Goat Veterinary Society and British Cattle Veterinary Association (BCVA). We have also had sight of the Pig Veterinary Society’s (PVS) response to this consultation.

General proposed changes

3. We support the proposed changes to the Traceability & assurance status and Vermin Control sections.

   - **Vermin control**

4. We agree with the proposed changes to tighten the requirements around vermin control to ensure that Red Tractor meets the ‘Campaign for Responsible Rodenticide Use’ ‘Code of Best Practice’. By making these changes - including using non-chemical control methods, risk assessment methods and minimising vermin entry points - the use of chemical lethal control should be kept to a minimum.

5. In terms of controlling wild species and vermin control, BVA has developed policy statements on snaring and rodent glue traps. We accept that snaring is necessary in certain circumstances for the purposes of pest control. However, our position calls for further research into more humane alternatives and compliance with Codes of Practice, as well as additional steps to minimise the capture of non-target species. We would ultimately like to see the use of the traps by professionals banned and their sale to the public banned.

6. BVA has also produced guidance on wildlife management, for use by farmers and others, as well as an ethical framework which sets out ethical questions that should be answered when an organisation is considering methods of controlling wild species. These are all available on the [BVA website](https://bva.co.uk).

   - **Use of medicines**

7. As a founder member of Responsible Use of Medicines in Agriculture (RUMA), BVA does not support the habitual use of prophylactic antibiotics and we welcome stronger Red Tractor standards to help controls on the use of antibiotics and improve medicine records.
We have produced various position statements, posters and guidance on anti-microbial resistance.

8. We support the requirements (included in all the standards except poultry), that medicine records must provide an annual collation of total antibiotic used for the unit. We have provided further comments on the use of medicines in relation to specific species in the subsequent relevant sections of this response.

- **Welfare at slaughter**

9. BVA and VPHA have concerns regarding the omission of parameters for waterbath stunning of poultry in the Welfare of Animals at the Time of Killing (England) Regulations 2015 (WATOK). Therefore we believe Red Tractor standards should take this into consideration.

10. While we broadly support the implementation of WATOK and new provisions to improve welfare, we are extremely concerned by the omission in the England Regulations of the electrical waterbath stunning parameters (set out in Annex 1 of the EU Regulation) to ensure that poultry are effectively stunned before slaughter.

11. This means that there is a risk that Red Tractor certified poultry could just be electro-immobilised, rather than stunned and therefore still conscious at the time of slaughter, causing avoidable animal suffering. Official Veterinarians and Animal Welfare Officers/slaughterhouse staff are unable to differentiate between the two states, making enforcement of legally required effective stunning impossible.

12. Waterbath stunning also has general limitations as a stunning method, based on factors such as the variable conductivity of the legs of different birds. BVA believes it should be phased out and replaced by gas-based methods as a more humane alternative.

13. Therefore, until waterbath stunning is phased out, we are calling for the WATOK legislation in England to be amended to include EU parameters for electrical waterbath stunning of poultry, to ensure they are stunned effectively and therefore unconscious at the time of slaughter. In the meantime, to help improve animal welfare, Red Tractor should incorporate EU parameters into its standards.

- **CCTV in slaughterhouses**

14. In February 2015 the Farm Animal Welfare Committee (FAWC) published an Opinion report (335 KB PDF) on Closed Circuit Television cameras (CCTV) in slaughterhouses and BVA supported FAWC’s 12 recommendations to improve animal welfare at slaughterhouses.

15. In light of the FAWC report, in July 2015 we developed a policy position (90 KB PDF) with the Veterinary Public Health Association (VPHA), which calls for all slaughterhouses to install CCTV in all areas where live animals are kept and killed. Official Veterinarians and other enforcement officers, must also have unrestricted access to any CCTV footage of slaughterhouses and this should be written into UK legislation.

16. In order to help protect animal welfare, BVA and VPHA propose that the Red Tractor should adopt a policy for mandatory installation of CCTV in slaughterhouses used by Red Tractor farmers, along with unrestricted access for OVs to the footage.
Beef and lamb standards

- **Housing, shelter and handling facilities**

17. We broadly support the requirements for appropriately managing tethered livestock, such as providing them with exercise, untethering prior to calving and not allowing year round tethering. Though for the sake of animal welfare, we would prefer cattle not to be tethered, unless for the purposes of treatment or examination.

18. We recognise that as a result of exceptional extenuating circumstances or geography, tethering cattle for the winter could be judged necessary. These circumstances should be rare and an absolute last resort. However, in such circumstances we would prefer a minimum daily requirement for livestock to be untethered rather than requiring that ‘untethered exercise is provided daily.’ Therefore, we propose that this point should be replaced with “Cattle will be untethered for a minimum of 4 hours a day, for exercise.” We consider that the practice of tethering should eventually be phased-out on welfare grounds.

19. We note that in relation to tethering, the Welfare of Farmed Animals (England) Regulations 2007 (WoFAR) state:
   a) No person responsible for a calf may tether it or cause it to be tethered, with the exception of group-housed calves which may be tethered for a period of not more than one hour when being fed milk or milk substitute.
   b) Where tethers are used in accordance with sub-paragraph (1), the tether must not cause pain or injury to the calves and must be inspected regularly and adjusted as necessary to ensure a comfortable fit.
   c) Each tether must be designed to avoid the risk of strangulation, pain or injury and allow the calf to stand up, lie down, rest and groom itself without hindrance.

20. The [Cross Compliance guidance](#) also reflects the WoFAR legislation.

- **Feed and water**

21. We welcome the new requirements for livestock to be provided with sufficient roughage/forage, assessment of body condition and maintenance of water troughs. We also agree with the requirement for bought-in feed to be from an assured source and not permitting material from Anaerobic Digesters to be used in animal feed.

22. Water must available at all times (i.e. 24 hours a day) for stock, and emergency plans should be in place in case there is a problem with the water supply.

- **Animal health and welfare**

23. We note and support the revision requiring the antibiotic collation records to be signed by the vet. However, there is a risk that this could result in a ‘tick box’ exercise, and in order to achieve improved antibiotic stewardship, we would suggest that it would be preferable to make it mandatory to have a veterinary produced health plan, rather than a veterinary review of a health plan.

- **Biosecurity and disease control**

24. The proposal for a well maintained biosecurity plan for each farm is to be welcomed, along with the provision of cleansing and disinfection facilities. Any biosecurity plan should include suitable provisions for the quarantine of incoming stock, as well as clarifying boundary risks and recommending measures to control the risk of the spread of disease.
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- **Animal medicines and husbandry procedures**

25. In addition to the points made in the General section, specifically in relation to the Beef and Lamb standards, we support the requirement that all livestock leaving the farm must be accompanied by a declaration confirming if medicine withdrawal period is applicable.

Dairy

- **Milk production**

26. We concur with making it a requirement that milking machine testing must be undertaken by a competent engineer or technician. It also seems sensible that cleaning chemicals should not contain quaternary ammonium compounds (QACs), as stated on the chemical data sheet.

- **Housing, shelter and handling facilities**

27. We note the proposed best practice that colostrum is received within 2 hours and if colostrum is provided from an alternative source to suckling, a system is in place to ensure that the correct quantity of colostrum is given (for calves, up to 3 litres or 10% of body weight as a first feed). The standard must emphasise that three litres of colostrum for calves is the absolute maximum and should it be made clear that giving three litres can cause problems in many systems. We understand that 42% of dairy calves receive suboptimal passive transfer of immunity, so measures need to be introduced to improve this. Therefore, we welcome the principle behind this recommendation and we broadly support it. However, we recommend caution in relation to the proposal that colostrum must be received within two hours, as it is not always practically possible to meet such a short timeframe, due to various circumstances.

28. The Cross Compliance guidance on the welfare of calves supports our proposal that it is best practice to provide colostrum within two hours of birth, while recognising this may not always be possible. This guidance states: 'Make sure that each calf gets bovine colostrum as soon as possible after it’s born and in any case within the first 6 hours of life'.

- **Feed and water**

29. The recommendation that livestock rations and feed plans are developed by professionally qualified persons and water troughs are kept clean seem sensible, along with keeping injurious weeds in fields that livestock have access under control.

30. We realise the recording of forage only, or forage top-dressed with concentrates as a mix, may prove challenging in relation to quantities; particularly where a mixer-wagon is not used. However, we consider it would be prudent to recommend continuing recording the quantity of concentrates used, and undertaking forage analysis where possible.

- **Animal health and welfare**

31. As part of the requirement that the health and welfare of livestock must be met at all times, it seems reasonable that lame cows are required to be identified, treated and managed appropriately.

- **Artificially reared youngstock**

32. We note the following new requirements:
Artificially reared youngstock must receive a daily diet to maintain their health and welfare

- Milk (excluding colostrum) from cows under the statutory withdrawal period for antibiotics not fed to youngstock
- Youngstock given dry, fresh, clean feed and forage (e.g. hay or straw but not including bedding) from 8 days of age (latest) and receive a sufficient and wholesome diet post weaning

33. We support the first and third bullet points above. Whilst feeding milk within a withhold period to calves may appear a good use of resources, it is hypothesised to increase the risk of developing antibiotic resistance on farms. Therefore, we currently advise against feeding calves waste milk with some antibiotic in it. While we are aware that routes for disposal of waste milk are also understood to increase the risk of resistance, we consider this should not detract from the message of tackling antibiotic resistance. We also consider that further research is needed in relation to this issue and it would also be helpful to define colostrum.

34. We support the testing of colostrum quality. However, most colostrometers use a traffic light system and as such, numerical minimums should be avoided. We would prefer wording such as: “It is recommended that for the first two feeds, colostrum is tested prior to feeding. Ideally only good colostrum is fed. If colostrum quality is poor, please refer to a vet or feed consultant as to how to improve. Colostrometers are available from the majority of vet surgeries and farm stores.”

- Animal medicines and husbandry procedures

35. We support the recommendation that at least one member of staff responsible for administering medicines, should have undertaken training and holds a certificate of competence.

36. We support the requirement that the vet must undertake an annual review of antibiotics used on the farm. This would include discussion about the use of Critically Important Antibiotics (CIAs) or Higher risk CIAs (i.e. Fluoroquinolones, 3rd and 4th Generation Cephalosporins and Colistin) – including review of any antibiotic failures – reviewing overall use of dry cow therapy and protocols, and where appropriate make recommendations for selective antibiotic use.

Pigs

- Traceability and assurance status

37. It seems sensible that imported stock and semen must be tested in line with the NPA Protocol before it is imported and a signed veterinary certificate must be provided from the vet responsible for the unit importing the stock/semen, confirming that pathogen test results are negative.

38. We welcome that it is be made a requirement that ear tagging or ear tattooing must be used to identify individual breeding animals, in line with the existing regulations.

- Feed and water

39. Clarification is necessary in relation to the requirement that if non-mains water is used, the water source is independently tested annually at source for harmful substances. It is
currently not clear what the water would be tested for, where samples would be collected and which standards would need to be met.

- **Animal Health**

40. We support the following proposed requirements:
- Removal of piglets from a sow at an age earlier than 21 days is not permitted unless the health and welfare of the piglets or dam would otherwise be adversely affected
- All supplementary rearing boxes must have been emptied, cleaned and disinfected and be dry prior to the next batch of piglets being placed in them
- All livestock units must retain the services of a named veterinary surgeon or practice - Vet registered with Red Tractor Assurance and is a member of the Pig Veterinary Society (PVS)
- Whilst staff are being trained, they are always under direct supervision when undertaking euthanasia by either a vet or a suitably trained & experienced person as signed off by a vet

- **Biosecurity and disease control**

41. We agree with the biosecurity requirements set out in pig standards B1.a Key and B1.a.1 to B1.a.5.

- **Animal medicines and husbandry procedures**

42. We note the proposed revised Red Tractor standards in relation to antibiotic treatment for pigs (standards AM.f.2 to AM.f.5) and we support the Pig Veterinary Society’s comments in relation to these proposed standards.

43. The relevant PVS comments are as follows:

    *AM.f.2* Total antibiotic used, including infeed antibiotics must be collated and uploaded on a quarterly basis onto the AHDB-Pork’s electronic medicines book. Total antibiotic used from 1st April 2017 to be uploaded by 1 October 2017. The timings of this requirement will not work from the veterinary practitioners’ viewpoint. For example, quarter 3 is July to September, and data will not be available by October 1st – however, the wording may not mean that and is open to mis-interpretation so this needs reconsidering and rewording so clear what the requirement is and to allow sufficient time for data to be collated (at least 6 weeks suggested). Following the approach of QMS and providing a calendar indicating when to enter data would be useful.

    *AM.f.5* Use of Class 3 antibiotics must be justified by the vet. There were comments highlighting that it must be clear that Red Tractor can only audit whether there is/is not a justification recorded - the content of that justification will be a clinical veterinary judgement (supported by sensitivity tests) and could not be audited by RT and by non-veterinary auditors.

More clarity is needed on what constitutes justification and how this would be audited during a RT visit. As indicated above, PVS considers that the attending veterinarian’s experience and sensitivity test results should be accepted as sufficient. The PVS prescribing guidelines indicate that antibiotic sensitivity tests must support use of class 3 antibiotics and suggest that this should be explicit in the wording. It was mentioned by a responding vet that a similar requirement was included in the new QMS standards and no response had yet been obtained to similar questions nor had it been brought up by any assessor yet so still unclear how this will work in practice.
It also says that CIA use should be recorded at time of prescribing and the justification should be recorded in the VHP - does this mean intermittent changes to VHP? This is required quarterly and to have to change it in between will be onerous and does not seem to provide advantage – should it say “Up-to-date justifications recorded in the subsequent VHP”?

Poultry

44. We agree with standard TI.a, that where necessary, records should be kept of the origin of chicks and this information passed on to the processor to allow accurate origin labelling of the final product.

45. We support the disease control measures set out in BI.a to minimise the spread of disease within the farm and between other farms and agree that consideration should be given to the potential hazards at each stage of the production process on farm, appropriate biosecurity controls to address each hazard and not sharing staff or equipment between farms. We also welcome the recommendation in BI.a.2 that there is a defined boundary such as a stock fence or hedge around the farm that prevents the access of stock and vehicles so entry and exit to the farm is controlled, as far as possible, through one entrance/exit point.

46. The stipulations (BI.c.1 and BI.e.1) for all new sites, that staff and visitor car parking facilities must be located outside of the biosecure area and that no unnecessary personal belongings must enter the biosecure bird area, seem sensible. We also support the requirement that producers must give consideration to ensuring that new production sites are located at least 1km away from the nearest other poultry farm.

- Animal medicines and husbandry

47. We recognise the importance of using antimicrobials wisely, as set out in AM.f 1-6. However, we do not support a complete ban on the use of 3rd and 4th Generation Cephalosporins, Glycopeptides and Colistin. While we would not support the use of these for a whole flock, as an absolute last resort and on veterinary advice, we consider that individual animals or quarantined groups may be prescribed these antimicrobials to help protect animal welfare.