BRITISH VETERINARY ASSOCIATION RESPONSE TO SOIL ASSOCIATION CONSULTATION

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.

2. In producing this consultation response, we have consulted with our Policy Committee, as well as the Association of Government Veterinarians (AGV), Pig Veterinary Society (PVS), Sheep Veterinary Society (SVS), British Veterinary Poultry Association, Goat Veterinary Society (GVS), British Cattle Veterinary Association (BCVA) and British Bee Veterinary Association.

3. We have addressed the consultation questions most relevant to the veterinary profession.

Animal transport requirements

Do you think existing laws provide adequate protection for animals during transport?

4. We consider that existing laws provide adequate protection for animals during transport and recognise that animal transport is a legal trade, and integral to agricultural life. The BVA transport policy states that:
   - Legislative improvements to minimise suffering are welcomed, but any such measures must be adequately enforced on a Europe-wide scale
   - Slaughter should take place as near to the point of production as possible.
   - Veterinary surgeons have a central role in effective enforcement of animal welfare standards
   - No animal should be transported unless fit enough to complete the entire journey without pain or discomfort
   - No animal should be exported and then raised in systems previously banned in this country due to welfare considerations. Neither should the meat from such animals be re-imported

5. We propose that the Soil Association (SA) should require organic producers to have their own transportation plan, so journeys can be planned and justified for the species held. While the EU Regulation includes standards to minimise the effects of any journey (and of course avoid pain/suffering) any journey will have some effect on an animal. These should be kept to a minimum necessary for the enterprise and reflects other principles, such as slaughtering as close as possible to the point of production.
Transport of pregnant and young animals

Do you think the European and UK legislation is sufficient to protect the animals' welfare?

6. The transport section of the Soil Association conditions (as proposed) broadly follows the EU Regulation on transportation EU 1/2005. We note that it omits regulation on the transportation of goat kids. While the Defra guidance specifically for goats mentions kids under one week old not being transported more than 100km, this is not referred to in the SA document. We suggest this is included.

7. BVA welcomes legislative improvements intended to minimise suffering and considers that no animal should be transported unless fit enough to complete the entire journey without pain or discomfort.

Welfare at slaughter

8. BVA has 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). While BVA broadly supports the implementation of WATOK and new provisions to improve welfare, BVA is 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.

9. This means that there is a risk that Soil Association 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.

10. 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. 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.

11. 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.

12. Furthermore, 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.

13. In order to help protect animal welfare, we propose that the Soil Association should adopt a policy for mandatory installation of CCTV in slaughterhouses used by Soil Association farmers, along with unrestricted access for OVs to the footage.
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Feed

Feed additives

Are you aware of any evidence to suggest SA should not permit the use of the proposed new substances?

14. We would welcome clarification on the use of mineral boluses in organic cattle and whether these are usually only permitted on advice of a vet where a mineral deficiency is noted, or can they be used as a preventative measure without evidence.

15. We would like to see Formaxyl or Vivovitall (organic acids) allowed to be added to feed to control post-weaning Salmonella rather than using antibiotics. We understand that some pig units have a derogation for using Formaxyl and consider that it would also benefit others.

16. We are pleased to note that there is greater harmonisation of Soil Association standards with other groups as far as feed and feed additives are concerned.

Feed additives conditions of use

Is there anything else SA should consider in updating these conditions?

17. We trust that products such as Miya Gold would be covered under Zootechnical.

Do you think this change will significantly increase the amount of dried milk farmers feed to their animals?

18. SA currently restrict the amount of organic dried milk (no more than 49%) which can be fed to young mammals. In light of the proposal to change this standard, in line with the EU organic rules, to allow greater flexibility to farmers who are trying to treat Johnes disease and wish to give 100% dried organic milk to help combat the disease, we note that farmers are unlikely to want to have unnecessary additional expenses and this proposal would only increase the use of milk where it is really needed.

Pigs and poultry production on in-conversion land

Do you have any views on this proposal to use the EU organic rules?

19. From the practical and business point of view, we consider that a six-month conversion process is preferable. We understand that there is a shortage of organic land so faster conversion will satisfy that demand. Furthermore, if a six-month conversion was deemed adequate and it was allowed for other species, it is logical that pigs which are not so pasture reliant and poultry should follow the same requirements.

20. We do not agree with the estimation that pigs can acquire 20% of their nutrition from pasture. Pasture may provide some fibre and interest but this cannot be considered as nutrition for a productive pig. With the exclusion of the first few days after the pigs are moved to new paddocks, the soil is also typically rooted and bared and there is no green cover to support their nutrition. Therefore, pigs are usually fed full rations on pasture.
Poultry

Smaller flock sizes

Do you support this proposal?

21. We do not support the proposal to continue to require smaller flock sizes than permitted under the EU organic rules. We recognise there is a correlation between welfare outcome and flock size, similarly, smaller flocks do seem to range better. However, it appears the specific number limit that SA intends to set will be ‘arbitrary’ rather than a definitively demonstrated number.

22. SA and producers should work together on this issue to ensure the SA standard is not prohibitive, does not put members off and eventually significantly increase the cost of organic eggs or meat.

23. We note that research has shown that welfare outcomes are closely linked to the quality of management and environment of the farm, rather than the flock size or production system. (References: Nature 427, 342-344 (22 January 2004) | doi:10.1038/nature02226; Received 26 June 2003; Accepted 19 November 2003; Chicken welfare is influenced more by housing conditions than by stocking density. Marian Stamp Dawkins, Christl A. Donnelly & Tracey A. Jones and Understanding Animal Welfare by David Fraser)

Size of the litter area

Do you agree that having a larger litter area makes it easier to keep the litter dry and friable?

24. We consider that a larger litter area does not necessarily make it easier to control the quality of the litter. Maintaining dry, friable litter is associated with good litter management, controlling litter temperature in comparison to air humidity to ensure dew point is not reached, as well as providing ventilation to remove any moisture deposited in the litter. Having larger litter areas has the potential to reduce the moisture deposited per unit area, yet it also has the potential to make controlling litter harder, as maintaining litter temperature will be more difficult. Litter quality is more likely affected by environmental factors than area; including prevailing weather or wind, and pophole size.

Is there anything else we should consider in relation to this requirement?

25. We believe that quality of management, environmental control, house design and equipment choices have the largest impact on welfare, and that understanding and training in these areas are key.

Aerial perch space

Is there anything else we should consider in relation to requiring aerial perch space?

26. We concur that aerial perching is an important factor in improving bird welfare, and birds are driven to perch. However, birds (including turkeys) can also damage themselves on any house furniture, so design and placing of perches is very important in maximising welfare. Design, flight angles and obstacles need to be considered, as there is a risk of keel bone fractures with aerial perches, creating a different welfare issue.
Giving birds access to the range from an early age

27. We consider that welfare outcomes are predominantly driven by the quality of farm management as already discussed. Housed birds are protected from some welfare insults such as predation, inclement weather and some diseases. For instance, mortality rates are consistently significantly higher in free range environments. Therefore, there are positives and negatives to each system.

28. Where free range systems are used, we recognise that birds experiencing the outdoor environment later in life after not being introduced at a younger age, will be likely to experience fear. However, the time at which it is acceptable to expose birds to free range environments, is more dependent on the weather conditions, rather than the age of the bird. Certainly the bird needs to have developed to the stage where it is truly homeothermic, but even then, small birds are easily chilled or even become hypothermic in uncontrolled environments. Poultry vets have known birds to die from hypothermia in free range environments.

29. We are broadly supportive of the sentiment, but have no avian-specific evidence to suggest a specific age for first access to range. This needs to be balanced with the risks from chilling and rain (especially before birds are fully feathered), and also predation.

30. We understand that for “standard” free range broiler production, 50% of their life is required to have access to range. Consequently, for a 56-day bird (reasonably typical free range kill age), this requires access to range from 28 days. We do not necessarily advise that this approach should always be followed.

Outdoor stocking density and rotation for laying hens

31. We support the proposal for part of the range to be temporarily restricted so the vegetation can grow back. Resting the range also has positive benefits on disease and parasite control.

Outdoor stocking densities for poultry kept in small mobile sheds

32. We support the proposal to allow table chickens, ducks and guinea fowl an increased stocking rate on the range for poultry in small mobile sheds (not exceeding 150 m² of floor space) from up to 2,500 birds per hectare to 4,000 birds per hectare, provided that the house is moved and a new range is provided for the next flock.

33. Focusing on range stocking density, does not address some of the key issues with ranging. The worst areas for poaching are on the “veranda” immediately next to the house. If birds are encouraged to range widely and move away from the house quickly, such as into suitable cover and the surface adjacent to the shed is managed properly, then many of the issues would be less severe. In addition, terrain and soil type (clay vs free draining) make a marked difference in range conditions.

Resting the range

34. We support the proposal to adopt the EU organic rules’ minimum of leaving the range fallow for two months between batches of laying hens and two months per year for table birds. We agree that nine months is arbitrary, and for some agents (e.g. worm eggs or coccidia), will be inadequate for effective inactivation. An outcome based assessment, based on disease prevalence, seems sensible.
New standard on natural cover

35. We note the SA proposal to require that 5% of the range available to the birds must provide natural cover. We agree that cover provides many benefits but it can also decrease natural disinfection of land. Therefore, it would be preferable if the cover used could still allow good drying of the land below, as well as access for frost and sunlight.

Artificial lighting

36. We support the proposal to continue to require that, if farmers use artificial light, the lights are dimmed before the lights are turned off. However, the provision of such lighting needs to be undertaken with care, because birds migrate at twilight, so there is a risk of smothering.

What makes a suitable perch?

37. Heavy birds can get foot damage from perching on bars, so platforms are preferable for heavy birds. In general, birds have better foot health if, where bars are used, bars of different diameters are used to prevent injury/damage to localised parts of the foot.

Pigs

Outdoor shelter space for pigs

38. We broadly support the proposal to increase the space requirements for pigs which weigh up to 50kg to 0.45 m² though we are unsure why the cut off is 50kg, as pigs are not finished at 50kg. We note that ‘space requirements’ are usually only seen as surface area per pig and do not take into account the volume of air space per pig. In a small volume shelter, a pig may need more surface space to have the same thermal comfort as well as quality of breathing air, compared to the same size pig in a large volume shelter (e.g. a large sow hut).

Breeding sow space requirements

39. We consider the proposed space allowances for breeding sows to be suitable. However, the proposal to bring the sows indoors in extreme weather would be impractical for large commercial herds. Farmers often do not have empty buildings available to take pigs indoors if the weather is bad. Re-grouping pigs would involve mixing and a lot of stress for the pigs.

Producing organic pigs

40. We agree with the idea that animals are managed to organic standards for their entire lives if they are to be sold as organic.

41. We note that SA is proposing to change its rules to adopt the EU rules which allow Non-organic animals to be brought onto organic farms for breeding purposes when organic animals are not available. This would limit the number of non-organic female breeding stock brought in to 20% of the existing herd or flock each year, instead of 10%. This change would still not allow bringing in of all replacements needed, so as is the case now, non-organic grower pigs would be allowed to be brought in. The change would however, allow faster expansion of breeding herds if desired.

Sheep and goats
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42. We do not have detailed comments to the questions relating to sheep and goats, and so have simply answered yes/no.

Housing stocking density requirements

Do you think the EU requirements for stocking density are suitable?

☐ No

Pen size for winter housing

Do you think the EU requirements are suitable?

☐ Yes

Pen size for lambing and kidding housing

Do you think the EU requirements are suitable?

☐ Yes

Producing organic wool

Do you think it is important that we have a higher standard to address the organic integrity of fleeces through on-farm management?

☐ No

Producing organic sheep and goats

Are the requirements for sheep and goats suitable?

☐ Yes

Mating sheep and goats on organic land

Should the offspring of animals mated on land which is converting to organic have organic status?

☐ Yes

Cattle

SA are proposing to require Soil Association farmers to have a system in place to minimise the number of unwanted calves being born. How effective do you think this would be in preventing male dairy calves from being culled?

43. The SA proposals to minimise unwanted male calf production seem sound. However, there is a risk that the requirements may drive the culling of unwanted male bull calves ‘underground’. Also, the margins for rearing bull calves are tight and if there is a requirement to produce these calves to the full organic standard, that may render such systems unprofitable.

44. It would also rely on the system used. If sexed semen is being used, 90% of calves are born as female. However, sexed semen does cost more than non-sexed. Defining ‘unwanted’ calves and acceptable levels of ‘unwanted’ bull calves would depend on the market place and breed used. We welcome efforts in reduction in the number of unwanted calves, through supporting opening markets or calls for scientific evidence and research.
Can you think of any improvements that would make this standard more effective, or any other ways to achieve the desired outcome?

45. The use of sexed semen has pros and cons. Alternative options where SA might help improve the situation include assisting farmers in finding markets for calves, or changing the public perception of veal.

**Winter housing space requirements for cattle**

46. The potential requirement for space outside might result in cattle being over-exposed to inclement weather with increased health risks. During the winter the preference should be to predominantly make space available indoors.

**Producing organic cattle**

47. The requirements for producing organic cattle appear reasonable. However, although the bull calf guidelines are commendable, more work could be done on how to practically implement these ideals, particularly around evidence base and advice.

**Bees**

48. In relation to the SA’s revised standards for organic beekeeping, we are not aware of any SA certified beekeepers, as the standards are very difficult to meet. It is likely that only small areas such as in national parks might be able to comply. Requirements such as replacing comb with organic wax defeats the object of local sourcing because there are no organic beekeepers so organic bees may only be sourced from another country. In the Preventing Disease paragraph, we are not clear what is meant by the requirement that disease prevention should be based on ‘exercise’ or ‘controlling the male brood in the hives’.

49. We note the feeding bees standard advises feeding with organic honey. However, honey imported into the apiary has the potential for disease spread. In addition, sourcing wax that is free from contamination is not possible.

**Treating disease and injury**

50. The section under treating disease and injury states that ‘When treating you must use phytotherapeutic and homeopathic products and the trace elements, vitamins and minerals... in preference to chemically synthesised allopathic veterinary treatment or antibiotics, provided that their healing effect works for the animal species and the condition you are treating.’

51. BVA cannot endorse the use of homeopathic medicines, or indeed any medicine making therapeutic claims, which have no proven efficacy. As with any medicine, we believe that veterinary medicinal products must be evidence-based, with any medicinal claims made by a manufacturer supported.

52. The SA standards also state ‘you must be able to demonstrate that you are treating animals affected by disease, injury or ill-health quickly and effectively.’ This creates a risk for animal welfare if organic farmers are being encouraged to initially use plant extracts, homeopathy and trace elements to treat diseases, and by the time it becomes apparent that these treatments are not affecting the disease process, it may be too late, or require more intensive medical treatment. There is a contradiction in requiring farmers to
demonstrate they are treating disease quickly and effectively, while recommending medicine with no proven efficacy.

53. We also have some concerns about the term "allopathic veterinary treatments", which is used by alternative practitioners to describe mainstream medicine and isn't recognised by the wider medical community or veterinary profession.