

## PREPARING AN ANIMAL HEALTH AND WELFARE STRATEGY FOR GREAT BRITAIN

*A consultation document by UK Government, the Scottish Executive and the National Assembly for Wales.*

Consultation response by Elm Farm Research Centre.

### **1.0 Position statement.**

#### **1.0.1**

No one of sound mind would admit to knowingly cause unnecessary suffering to animals. Yet animals are clearly suffering both from poor welfare conditions and, as a consequence, from poor health. We have seen the results in the epidemic proportions of recent outbreaks and the incidence of endemic disease and chronic health problems. In considering a strategy for the improvement of animal health and welfare it is necessary to identify the causes of the present suffering in order that it might be alleviated. It is our opinion that there are three categories of cause: financial pressures, ignorance and an inadequate regulatory framework.

#### **1.1 Financial Pressure.**

##### **1.1.1**

This must be the single greatest cause for animal health and welfare being compromised in animals kept for commercial gain. The market in which we operate is, to a great extent, governed by an economic model which pursues a global search for the cheapest cost of production, this not only encourages poor production standards in countries desperate for export income, but also in the importing countries where pressure to compete with cheap imports places an incessant demand for greater production, greater yields, faster growth. It is a race that has no winners, certainly not the livestock, nor even the farmers who secure a market only for as long as they can maintain the lowest production costs. The farmer is encouraged to see himself as part of an 'industry' rather than a 'profession' where the care of livestock becomes a cost to control rather than essential part of his duty of care.

##### **1.1.2**

This pressure translates in a very practical sense to the national and multinational corporations that control the bulk of the purchasing power for food products. These companies, which run supermarkets, chain restaurants, food processing industries and those that supply publicly procured food, dominate the market by their collective purchasing power. They are companies and their *raison d'être* is to produce profits for shareholders. Thus these companies are forced to follow a pattern of purchasing that is ever pressing for cheaper production costs and follows those sources around the globe if necessary to secure best margins. The companies are however also accountable to their customers, in as much as they rely on them for their income so if customer loyalty is swayed, by a sensitive non-cost issue, companies will respond to that issue, but only for as long as it is necessary to re-secure their customer base.

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### 1.1.3

On the farm these pressures are very real and are one of the fundamental causes of animal health and welfare pressures. No farmer wants to see his livestock suffer and yet he is required to maintain his relentlessly falling income by increasing yields and faster growth<sup>1</sup>. To do so he engages in practices that are contrary to his principles but whilst they are still lawful he has no alternative but to follow. Selective breeding for super yielding cows or chickens that grow so fast, so heavy their legs cannot support them; use of growth promoting drugs and high protein feeds; prophylactic medicinal approaches to herd/flock health issues; over stocking leading to overgrazing with soil damage and pollution consequences; sale to the highest bidder regardless of who they are and indeed where they are. These are the issues of animal health and welfare that this strategy must seek to address. These are the real causes of a national herd/flock so lacking in vital health that infection can seize hold and turn into an epidemic. These are the realities of livestock production in much of the United Kingdom today.

### 1.1.4

The concept of 'vital health' is one that has been lost from most conventional agricultural productions systems. It is certainly proven that healthy animals suffer less from disease and are better able to counter infection<sup>2</sup>, but the animal production systems in use do not place the health of the animal as the priority, but treatment of disease. The vital health approach requires firstly an understanding that domestication of animals is unnatural and therefore inevitably limits their natural tendency to 'take care of themselves' as they would do in the wild. The intrinsic character of animals, their telos, must therefore be recognised in both their breeding and keeping. From this starting point it is possible to see the significance of giving domestic livestock the maximum opportunity to exhibit their natural behaviour. Such an approach immediately recognises that the animal is indistinguishable from their environment and that the health of one is linked to the health of the other. This is one of the founding principles of the organic approach.

### 1.1.5

There are other consequences of lowest cost trade that occur beyond the farm gate and still have a significant effect on livestock. The larger the corporation, the greater the attractions of centralisation of purchasing and delivery this, in turn, leads to a huge transport burden both in the distance animals travel to slaughter but also in the subsequent processing, packaging and distribution of food stuffs. Such impacts are of course exacerbated by the low value and costs placed on non-renewable fuels especially the fuel for air traffic. All this transport has an environmental cost that is equally implicit in the lowest cost system. Of course it is also the driver behind the long distances that animals travel to slaughter and the consequences thereof on the health and welfare of those animals.

### 1.1.6

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<sup>1</sup> Defra: Total Income From Farming figures published annually show lowest farm incomes in real terms since 1985

<sup>2</sup> Howard, A. Sir. *An Agricultural Testament*. First published 1940, London.

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Similarly this 'race to the bottom' creates the nonsense of product exchange where countries exchange imports and exports with each other of identical products adding to transport, pollution and waste and achieving nothing<sup>3</sup>. This same logic allows the live transport of lamb from a lamb producing nation at one end of the EU to another lamb producing nation at the other.

### 1.1.7

Production efficiency has been the target of the industry for so long it has become embedded and it seems hard to conceive of any other driver. That the research scientist should be considering priorities other than improved costs of production becomes unthinkable. How else can one account for breed selection that is incapable of calving, chickens and turkeys that cannot stand under their own weight and dairy cows which produce such high yields that their lives are both sickly and short. High yielding dairy cattle are known to suffer from shortened life expectancy; serious metabolic problems; they require permanent housing; have insufficient resting time; weakened constitution and are vulnerable to disease and increased incidence of mastitis, yet the breeding of such cattle continues to favour yield above any other consideration.

## 1.2 Ignorance.

### 1.2.1

When the general public is exposed to the conditions in which livestock are kept their reaction is normally one of shock and occasionally horror. This is attributable to many causes: poor education; remoteness from agriculture - even for those that live in the countryside; ignorance of the direct and indirect consequences of their dietary choices. If the public were more aware that the purchases they made were, on every single occasion, a validation of the system that their food had been produced under, they may consider their choices more carefully. Those that are aware of their purchasing power choose to use it to support practices that they find more acceptable, such as organic, even if there is still a level of ignorance about what such labels actually stand for.

### 1.2.2

Consumers' dietary ignorance is a further engine for maintenance of the current systems. Our national high fat, high salt, low fibre, low vitamin diet directly contributes to the nation's health problems of obesity, asthma, cardio-vascular disease and cancer. This is in part due to the high levels of animal protein that occur in the diets of developed nations<sup>4</sup>. It also contributes to an unhealthy herd/flock by not recognising the true cost of animal production in the low price that readily available

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<sup>3</sup> Jones, A. Eating Oil: Food supply in a changing climate. Sustain and Elm Farm Research Centre. 2001.

<sup>4</sup> Crawford, M.A. 1991. Fat animals-fat people. World Health, July-August 1991.

Key, T.J. et al. 1999. Health benefits of a vegetarian diet. Proceedings of the Nutrition society v.58 p271-5

Thorogood, M. et al. 1994. Risk from cancer and ischaemic heart disease in meat and non-meat eaters. BMJ v.308 p.1667-1671

National Aspects of the Development of Cancer. Department of Health, 1998 HMSO. London

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animal protein commands. Higher priced meat only makes for a more expensive shopping basket if you eat it as often as you ate its lower priced counterpart.

### 1.2.3

There is a further ignorance about the true cost of most agricultural production. The 'cheap' milk or poultry or pig meat that comes from highly intensive systems is in part cheap because the producer is not paying for the environmental consequences of their farming systems. The consumer though does ultimately pay, in higher taxes or through water bills, for the cost of cleaning out the pollution that intensive livestock production causes<sup>5</sup>. The cost borne by the UK in supporting the Common Agricultural Policy goes in part to prop up the livestock sector. The costs borne by the consumer for dealing with outbreaks of disease can be attributed to the poor health and vitality of the national herd/flock which global trade and intensive livestock systems tend to produce<sup>6</sup>.

### 1.2.4

The industry has developed its own ignorance but this is in reality more of a blind-spot, a refusal to recognise truths that are easy to see. The industry will collectively proclaim that it does not cause suffering to animals whilst the individual farmer, when pressed, recognises that this is not true. The scientific community will defend its embryo transplant technology as a breakthrough, one which only became necessary after the industry developed a breed incapable of giving birth to its own young. This kind of entrenched systematic 'ignorance' should be exposed through the development of this strategy.

### 1.2.5

There is also real ignorance of the basics, the rules, the guidelines and the codes of practice such that farmers continue in breach of the law until some accident catches up with them. The blame for this ignorance should not be left solely at their door however, the Government must shoulder the burden if it sets rules and does not ensure that people know what they are, nor adhere to them when they do. The pressure to reduce farm labour costs has resulted in deskilling with the loss of specialisms, such as specialised stockmen, reduced levels of training, time pressure for faster turn around and reductions in job satisfaction and security resulting in poorer performance, lack of physical contact with livestock, tractor based management systems, etc.

## 1.3 Inadequate regulation.

### 1.3.1

This issue has different forms, it is sometimes characterised as a result of policy makers being subject to industry pressure, which in turn is seeking the least cost of production to maintain its economic advantage. One example would be the banning of battery cages in the EU. Much of the good which could have been done by this regulatory change has however been undone by the introduction of a new 'enhanced

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<sup>5</sup> Pretty, J. et al. 2000. An assessment of the total external costs of UK agriculture. *Agricultural Systems*, 65(2), 113-136.

<sup>6</sup> There have been various attempts to quantify the cost of FMD on the UK economy. Estimates vary from £4billion to £20billion.

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cage' which preserves the essentials of the cage system and has not been demonstrated to give any welfare benefits. It is ultimately only a stalling tactic by the industry to put off the cost of restructuring, and they can rightly claim that they will have to restock with new cages at considerable expense. The issue is whether the intention of the regulation, namely to improve the welfare of caged chickens, is going to have any impact and this seems unlikely.

#### 1.3.2

In the UK there is a voluntary code of practice for animal welfare. Such a Code only becomes effective if there is adequate adherence, training and support. All this ultimately comes at a cost to the taxpayer or the consumer and they must accept the consequences that meat from well cared for livestock costs a little more but that this cost is at the prevention of suffering and cruelty.

#### 1.3.3

Assurance schemes are offered as an alternative and it is true that some of these offer welfare benefits. Many however do not and simply require adherence to the law and the Codes of Practice that should constitute the minimum standard. The absence of external verification or inspection makes these schemes vulnerable to inaccurate interpretation or at worst fraud. In this respect they are inadequately regulated and the consumer is given an impression of benefit that may or may not be real.

#### 1.3.4

In addition to our opinion on these three causes of animal health and welfare issues, the strategy should also consider the wider consequences of a system that has such a bias towards promotion of intensification of the livestock sector.

#### 1.3.5

Do these pressures deliver for us other benefits that could compensate for these negative outcomes? No, they devalue the true cost of quality meat production focussing on low cost poor quality products which contribute to a poor national diet high in fats and salts and low in fibre and vitamins which in turn contribute to health issues such as obesity, asthma, CVD and cancer<sup>7</sup>. They cause concern over the prophylactic use of antibiotics, which are used as much for growth promotion as health concerns, and they can lead to very large and intense outbreaks of diseases in humans from food borne pathogens.

#### 1.3.6

And the environment suffers as well. The systems which serve the economic master well are those that squeeze the financial maximum out of the environment leading to overstocking, over grazing, soil structure damage, poor nutrient use, pesticide use leading in turn to diffuse pollution of water soil and air. The economics that justify centralisation and import/export exchanges of identical products create vast transport usage that consumes fossil fuel and contribute to green house gas emissions.

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<sup>7</sup> See references on page 3 footnote 4.

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### 1.3.7

We contend that there are no real winners from the system that we have constructed in the post war years. The European Union has recognised this in proposing radical reform of the Common Agricultural Policy, the UK Government has recognised this in its rural white paper<sup>8</sup> and more recently in its Strategy for Sustainable Food and Farming<sup>9</sup> this strategy must also come to terms with the concept that the problems we face in the health and welfare of our livestock is the result of the production system we have developed. Support for systems which have a different approach to farming and animal health is growing, such as organic agriculture,<sup>10</sup> and this review should recognise that such systems offer a profound solution to many of the issues raised.

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<sup>8</sup> Our Countryside: the future – a fair deal for rural England. White paper. HMSO, 2000.

<sup>9</sup> The Strategy for Sustainable Food and Farming – Facing the future. DEFRA, 2002.

<sup>10</sup> The Organic Action Plans separately published for England, Scotland and Wales

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*2.0 Do you agree that we need a more strategic approach to health and welfare in Great Britain? If so what do you think such a strategy should cover? Do you have any other views on the reasons for a strategy?*

### 2.0.1

We welcome the intention of a strategic approach, especially one that combines the issues of health and welfare. Inadequate welfare of livestock has long been recognised as the single most important factor in health and the ability to shed or resist infectious disease.<sup>11</sup>

### 2.0.2

There is an understandable bias towards prevention of disease outbreaks in the strategy which, in the light of experience over the last few years, is entirely understandable. The strategy should however regard health and welfare as the primary mechanism for disease prevention and we would argue for the principle of vital health gives equal consideration to an animal's physical health, physical conditions and interaction with its environment.

### 2.0.3

This strategy must not be developed in isolation. The Government has set out its intention to create Sustainable Food and Farming<sup>12</sup> and has also identified a strategy for sustainable development<sup>13</sup>, a white paper on how it intends to change the nations health<sup>14</sup> and statements on transport and energy<sup>15</sup>. The principles set out in these papers should not be forgotten in considering this issue as they do bear upon it.

### 2.0.4

The strategy should also consider the EU position, not only specifically on EU legislation for animal health and welfare directly, but also its other strategic intentions. CAP reform<sup>16</sup> that recognises the folly of an agricultural strategy focussed solely on production, a health strategy that recognises the importance of health promotion rather than cure<sup>17</sup> and its strategic environmental ambitions such as those for reducing agricultural pollution<sup>18</sup>.

### 2.0.5

And finally we have emphasised the global context in which food production now sits. This document must also therefore challenge the constraints of global trade rules

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<sup>11</sup> There are many authors who have written on this subject notably Sir Albert Howard, Lady Eve Balfour and Professor Webster.

<sup>12</sup> The Strategy for Sustainable Food and Farming – Facing the future. DEFRA, 2002.

<sup>13</sup> A better quality of life: A strategy for sustainable development in the UK. White paper, HMSO, 1999.

<sup>14</sup> Saving lives: Our Healthier Nation. White paper, HMSO, 1999.

<sup>15</sup> Our energy future – creating a low carbon economy. White paper, HMSO, 2003

<sup>16</sup> Mid Term review of the Common Agricultural Policy. COM (2002) 394 final. Commission of the European Communities

<sup>17</sup> Food and nutrition action plan for Europe. World Health Organisation 2000 and the EU Eurodiet project

<sup>18</sup> There are many EU Directives and Regulations in force to deal with agricultural pollution issues, an example would be the Water Framework Directive 2000/60/EC

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which risk the creation of high standards in the UK that will ultimately only benefit agricultural systems with lower standards in other countries. This will not have the benefits desired but will simply export our welfare concerns overseas where we will have even less control over them. As such it is essential that we secure the right to refuse imports from countries that set lower health and welfare standards than ourselves, just as is permitted for environmental standards. The ambition of creating fine standards for UK agriculture will be of no use if the food we end up eating is produced to poor standards at the cheapest world cost and as a result UK livestock agriculture declines to a speciality market for the wealthy.

### 2.0.6

To that end the strategy must address the issues of illegal imports. There has been a surprising lack of action by the Government on this issue, despite the clear outcomes of the Reports on FMD. Until illegal imports are satisfactorily dealt with they constitute a continual threat to animal, (and human) health.

*2.1 Is the draft vision set out in Section 10 a desirable future for animal health and welfare in Britain? What is your vision?*

#### 2.1.1

We do not find Section 10 to be visionary or inspiring. It does not say anything that you can disagree with, but because it does not define what it means it is not possible to agree or disagree with it. We feel that this part of the strategy is very significant and yet needs considerable work. We give two examples rather than going through every line.

#### 2.1.2

“Animal welfare practices enhanced and promoted.” It would be unthinkable to say any less, i.e. that they should stay as they are or decline, but beyond that the ‘vision’ does not identify what position it desires. A visionary statement would aspire to a particular goal such as “the reduction of antibiotic use and that these should only be used for therapeutic treatment not for prophylaxis and growth enhancement.”

#### 2.1.3

“Research is targeted on priority areas” is impossible to disagree with because it says nothing. What priorities, set by whom? What it should say is that ‘Research effort should be redirected to consider animal health and welfare as equally important to economic gain in all aspects of livestock science from breeding through the animal’s life to slaughter’.

#### 2.1.4

Our vision would be for a livestock industry that can afford to look after its animals as well as it would like to and with a regulatory system that supports animal keepers to develop best practices in their own industrial sector. We seek a strategy built upon the principles of vital animal health and natural behaviour that recognise the implicit interactions between livestock and their environment. We seek a strategy that



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recognises the inter connectedness of issues of food, diet and health; and the issues of intensive livestock production and environmental damage.

### 2.1.5

We would also like the strategy to set targets such as ‘finished livestock should never have to travel more than 20 miles to slaughter by 2005’. By doing so progress towards a specific aim can be measured by the collection of data. In this way a strategy could start to make a tangible difference and contribution to the changes necessary in our agricultural practice. Similarly such a target draws attention on the conditions of a journey so the statement becomes extended to include ‘On all journeys animals should be provided with straw and in sufficient space for them to lie down so that they are not in danger of being thrown about’. Further it calls into question journeys of animals not necessary for slaughter, such as inter-market transfers, and calls into question the necessity for the retention of such systems.

*2.2 What economic, social, environmental and welfare benefits are you looking for from the Strategy? What costs need to be taken into account? And how should these be balanced?*

### 2.2.1

We see potential benefits right across society; a healthier nation, eating a healthier diet, of healthier food, from healthier livestock, resulting in healthier soil, water and environment. This recognises that meat should be more expensive and less of it consumed. Better livestock production systems would reduce pollution, have reduced incidence of disease and food borne pathogens, and reductions in both endemic as well as epidemic disease.

### 2.2.2

Cost distribution should reflect the external costs and public benefits, thus if local abattoirs reduce lorry transport thereby reducing carbon emissions, particulate pollution, global warming and human health issues and of course animal welfare, then these factors should be equated in the economics of such a decision and not left solely to the market. Thus such business may need to be given fiscal advantages or capital support to offset the market economies of centralisation.

### 2.2.3

The cost should also move towards greater internalisation. Thus if intensive livestock contributes to diffuse pollution it should have to pay the bill because in reality it is not ‘cheap’ it is just that the costs are hidden. That such a burden might render some industry sectors uneconomic is an accepted conclusion and will encourage the structural changes in agriculture that we see as being necessary to ultimately improve animal health and welfare. Systems like organic farming which do internalise these costs appear expensive only because the alternatives have this hidden subsidy which the consumer ends up paying for in taxes, water bills and their own health.

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2.3 *Can you identify any potential conflicts or risks that might challenge the draft vision?*

### 2.3.1

We do not underestimate the depth of change that we feel is necessary and such a shift in the principles of livestock production will provoke a reaction from all those with a financial stake in the *status quo*. That said, any attempt to tighten the regulatory aspects of livestock production will engender such a reaction and we encourage the strategy to be bold in its proposal

2.4 *How can we build the new contract and make partnerships with stakeholders work?*

### 2.4.1

Making such changes as we see as necessary is going to be very hard unless there is honesty in the debate – that farmers recognise they are pushing their animals too hard; that science has to set new priorities; that purchasers recognise the impact of cost pressure on producers and the impacts on the environment of centralisation; that Government recognises its approach has to shift away from the established doctrine of cost control if it is to have any real and lasting impact on livestock health and welfare; and that Government resolves the essential conflict between setting high standards in the UK whilst permitting and indeed encouraging the import of products of a lower standard from the rest of the world.

2.5 *What is your most important long-term animal health and welfare priority? Do you agree with the issues and themes from stakeholder meetings? Do you have anything to add?*

### 2.5.1

Our most important long-term priority would be tackling over intensification of the livestock industry especially in pigs, poultry and dairying.

### 2.5.2

Whilst they form a useful basis for the debate in identifying the themes that must be considered, we have many concerns with the ‘issues’ identified. These do not, in our opinion, get to the heart of the problem. They offer bland overarching statements that allude to the problems but fall short of the honesty that we describe as being necessary in our previous answer.

### 2.5.3

The ‘ideas’ section has greater benefits at this stage and many of the actions proposed, for example the role of health plans, do in our opinion demonstrate an understanding of the sorts of practical changes that will need to be considered.

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#### 2.5.4

Of particular interest is the role of vets and the distinction between the role of a statutory veterinary service and private vets. The latter have problems which are associated with two issues. Firstly vets treat patients, but these are not their clients. If therefore a complaint is brought about by the mistreatment of the animal by their client – the keeper – then a vet has difficulty in addressing this<sup>19</sup>. They have no statutory duty to report their client for neglect or mistreatment; indeed such information may be regarded as being confidential. The second issue is that the majority of veterinary income is derived from offering treatment, be that medication or intervention, there is no such financial incentive to offer ‘health’ and this brings about another conflict of interest.

#### 2.5.5

We see a greater role for a statutory veterinary service in overcoming these difficulties, especially in the promotion of herd health through a supporting and monitoring role associated with the production of herd health plans.

#### 2.5.6

We also strongly support the review and redirection of scientific endeavour. This will require a review of research priorities that acknowledges the principles of vital health and restores a balance between issues of animal health and welfare as against the current dominance of production economics. Such a review should also encompass not only the national herd/flocks ability to deal with epidemic infection but must also consider national endemic conditions and their root causes rather than their treatment.

#### 2.5.7

Mentioned at various points in the strategy is the issue of skills availability. This is not just a question of appropriate training and recruitment but also of staffing levels. It is possible for livestock to remain uncared for, even in extensive livestock systems, if the staff to animal ratio becomes extended. There is of course a natural tendency for economic pressure to do this, but the consequences for livestock care must be recognised in the strategy.

*2.6 Your views are sought on the value of animal health plans: do you think this is something that should be expected from all animal keepers?*

#### 2.6.1

We regard animal health plans as being an essential element in bringing about change in the livestock sector. We recognise that there is pressure to increase the regulatory network by either licencing of animal keepers, or by increasing statutory standards. In our opinion neither of these will bring about the changes necessary and will simply increase the burden of administration on animal keepers. This becomes yet another

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<sup>19</sup> “What the animal welfare movement expects from the veterinarian.” Hollands, C. Proceedings of the Biological Council Lecture. 1987.  
Also Davies, K.B. Report in The Scotsman, 4<sup>th</sup> April 1986

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cost pressure that will bring further pressure for savings elsewhere in the production system to compensate, this could lead to more intensification or more cost savings such as further reductions in labour. Furthermore licencing or regulation will only be as effective as the level of policing, and the cost of that will end up being borne by the public purse. If all the effort involved ultimately has only a marginal benefit on animal health and welfare it will prove an expensive cost benefit exercise.

#### 2.6.2

Instead we encourage the consideration of herd/flock health plans as being a statutory requirement for all keepers of livestock for commercial gain. But this requirement must be enabled by providing support in their preparation, implementation and most importantly their review, through an adequately skilled and funded statutory veterinary service. Such a service would need to comprehend the principle of vital health and animal freedom and should also have the role of reporting abuses to an enforcing authority.

*2.7 Have we set out accurately the roles of Government, the livestock industry, and other stakeholders? Is the balance of Government intervention right? What are your views as a taxpayer?*

#### 2.7.1

The role of Government should include a responsibility to ensure that this policy reflects other Government policy and that the action to tackle issues is co-ordinated. Given the role of international law in determining the operation of the market in the UK, right down to the level of individual transactions, the government should recognise the significance that international trade rules have on animal welfare and should actively seek parity of standards with our partners in the EU and across the world.

#### 2.7.2

Apart from the regulatory changes we have outlined elsewhere in this response we also see a role for government in promoting consumer awareness. This needs to encompass not only the impacts of eating high levels animal protein in their diet but also the true costs and consequences of intensive livestock production on the health and welfare of animals and also on the environment. Such education should start in the classroom and continue through to the point of purchase.

*2.8 Do you have views on the scope of the strategy and how far beyond farmed livestock and companion animals it should extend?*

#### 2.8.1

We have considered the issue of scope in our opening position statements and remind you of our concern to see this strategy link up with other broad strategic issues of national health, environmental consequences and the position that the UK takes on the global stage of negotiations as regards agricultural products.

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#### 2.8.2

We see a potentially useful distinction between animals kept for commercial gain and those kept for companionship. Our comments have chiefly responded to the questions around keeping livestock for food production but we have observed that it is commercial pressure that causes many of the problems. We observe a parallel pressure for other animals kept for commercial reasons and feel that this would provide a logical extent for the strategy.

#### 2.8.3

We also find it inconceivable that a UK animal health and welfare strategy would not cover the issues of animal experimentation, genetic engineering of livestock and 'pharming' – animals kept to generate pharmaceutical products. All of these would be incorporated within the 'commercial gain' category and therefore eligible for inclusion.

#### 2.8.4

In particular The Agriculture and Biotechnology Commission Report, published in the Autumn of 2002, called upon the Government to set up a new strategic advisory body to consider the development of genetic modification in animals – particularly farm animals; a review of the relevant animal welfare legislation and new regulations; independent scrutiny of how existing farm animal welfare legislation is interpreted and enforced; a system for monitoring the progress of genetic modification and cloned animals to look for unexpected health and welfare problems; and monitoring international movement of GM and cloned animals and reproductive material. It is essential that this strategy preparation integrates fully with this new Commission.

*2.9 For England and Wales, a commitment was made in the FMD Inquiry response to seek views on the regular reviewing and issuing of progress report on the state of emergency preparedness: what do you think would be the most appropriate format for these? How often do you think the Government should issue them?*

#### 2.9.1

We can see no particular benefit in knowing that we are well or ill prepared for an outbreak of a highly contagious disease. Whether we are well prepared or not will have no impact on the timing of an outbreak shortly after which it will become immediately apparent whether or not we were sufficiently prepared. The issue of notice provision therefore becomes irrelevant.

#### 2.9.2

What would be more useful to know is what the detailed plans are for when an outbreak of a highly contagious disease does occur, which in our nationally unhealthy herd/flock it is only a matter of time. Such information should be available from the relevant agencies and should include trigger events, statements on control measures, procedures and compensatory framework. This in our opinion would demonstrate that the appropriate lessons have been learnt.

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### 2.9.3

We would also like a similarly detailed consideration of endemic conditions in the UK national herd/flock such as bovine TB, mastitis and Newcastle disease.

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This consultation response is made for and on behalf of Elm Farm Research Centre by Policy Advisor Charles Taylor, with particular assistance from Joanne Bower.

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