

Written evidence submitted by the RSPCA (PRO0020)

Introduction

1. The RSPCA welcomes the opportunity to be able to respond to the above consultation. The RSPCA is the world's oldest and best-known animal welfare organisation. The RSPCA's farm animal science department writes the welfare standards for assurance schemes such as RSPCA Assured. The RSPCA works extensively with retailers, food companies and government to improve choice based on welfare grounds.
2. There have been shifts in consumer buying behavior in sectors such as eggs and chickens towards higher welfare standards in the past five years based on moves from retailers and other food companies to improve their standards. Some Government procurement policies such as the decision by the Welsh Senedd in 2010 to source solely RSPCA Assured eggs, salmon and chicken, have assisted these aspirations.
3. RSPCA Assured is the UK's only higher welfare farm assurance and food labelling scheme. It was set up in 1994 as a registered charity and has over 3,000 producers. RSPCA Assured farms now account for over 25% of the pig herd in the UK, 12% of the turkey flock and 55% of the laying hens flock. It has around 70% of the Scottish salmon market. This underlines the pull factor that higher standards can have on the market place, consumers preference to change actual buying behavior despite priced differential and farmers' willingness to change their farming practices, moving up the ladder of welfare standards, to seize opportunities given for better profitability from higher welfare standards.

What impact have Defra's 2014 Plan for Public Procurement and the Government Buying Standard (GBS) had and how could they be improved?

4. The RSPCA welcomed the principle behind the Government Buying Standard (GBS) when it was established in 2014 for acknowledging that animal welfare has a place in determining government buying behaviour. However the RSPCA had concerns that the GBS did not set a high benchmark for animal welfare, particularly when compared to its fish and environmental standards. The Government, through its procurement policies has a pivotal role to play to show that it is serious about increasing animal welfare standards and driving the market place forward due to its high procurement spend. In sectors such as eggs, meat and chicken procurement policy the standard set is at baseline (Red Tractor standard) rather than the aspirational (eg organic or RSPCA Assured). This is despite the fact that public opinion is very clearly in favour of higher standards, the lack of a clear economic case for not going higher and the fact that in other areas the standard is higher than baseline.

5. The GBS although only six years old, has not kept pace with the changing consumer market. The GBS set for eggs is simply not to use the conventional battery cage which has been illegal in the UK (and the EU) since 2012. Production of non caged eggs in the UK has been rising annually since 2003 and is now over 55% and is set to rise as retailers move to cage free eggs by 2025. The GBS for eggs is not only at a low standard it now represents less than half the eggs produced in the UK and cannot really be called baseline let alone aspirational. Indeed the policy is below that used by the Welsh Government and House of Commons banqueting policy (100% free range) and a number of local authorities.

The RSPCA is also concerned as the policy does not state that 100% of egg products shall be sourced from systems that are cage free. The egg market in the UK is now divided into shell eggs (around 60%) and egg products (around 40%). Many of the dried and liquid eggs used in egg products are imported from Europe or from outside Europe where conventional battery cages may still be used post 2012. As this part of the egg sector is the most opaque in terms of labeling and awareness, it is important that the GBS policy sets a criteria for non shell eggs. This is also a sensitive area in Free Trade Agreements where egg products such as dried or liquid eggs could be imported under negotiated FTAs but produced in systems illegal in the UK and still used in UK procurement. Clearly the GBS needs updating and should apply to all eggs and egg products and be cage free.

6. The GBS on meat is weak stating that only that it should be baseline and show country of origin. In many sectors the majority of meat is already produced under farm assurance schemes. For instance around 90% of chicken produced in the UK is produced under Red Tractor. In the meat sector over 95% of British pigs are sourced from Red Tractor as are over 75% of beef, lamb and sheep from Assured British Meat. So providing farm assured meat as the baseline is not aspirational. The RSPCA would recommend that this statement be changed to a percentage of meat and meat products are RSPCA Assured as a minimum and all are farm assured. A definition of which schemes would be acceptable would also ensure that the UK is striving to source from British herds and flocks. After 2021 England will be supporting and encouraging higher welfare chicken, meat and pig production through its new agricultural support scheme as set out in the Agriculture Bill. It would be appropriate if the GBS reflected this new direction of travel.

9. There is a higher standard given for seafood policy that all fish must be sustainably caught (defined as Marine Stewardship Council) and there is a higher environmental standard that at least 10% are approved to a standard such as organic. However there is no such standard for animal welfare.

What should the Government's priorities for future food procurement be and how should the Government support these priorities in the negotiation

of new trade deals?

10. The Government has a manifesto commitment to not compromise animal welfare in any future trade deals. Agreeing trade deals without tariff and non tariff protection would undercut UK producers that are producing to higher standards, potentially putting them out of business and leading to a race to the bottom. This is particularly in the sensitive products of eggs, pigmeat, chickens and beef. The UK should ensure that its GBS, which clearly states that products should be bought in line with British minimum welfare standards, apply equally to any free trade deals. This means that the UK Government should continue the non tariff measures prohibiting the import and use of growth hormones such as Bovine Somatotropin (BST) in dairy production and ractopamine in pig and beef production and for pathogen reduction treatments in chicken production. It should also continue its MFN tariff lines but offers the USA conditional liberalisation based on a Tariff Rate Quota or lower tariff for imports such as beef, pigmeat and chicken where these are based on equivalent UK standards and adopted based on a risk analysis of the impact of these tariffs and offering tariff-rate quotas (TRQs) on UK animal welfare standards.