

## **Written evidence submitted by the RSPCA (FS0009)**

### **Summary**

It is preferable not to have a finite minimum number assigned to food security, but British farming and the production of higher welfare products faces a number of unprecedented challenges in the coming year. Key factors affecting the food supply chains include the rising cost of energy and fuel, labour shortages and climate change. The rise in energy prices has a knock on impact on the availability and cost of fertilisers and the availability of carbon dioxide, a major concern in the pig industry. The impact of climate change, where drought was declared across six regions in England, is expected to impact on the amount of feed available to farmers during the winter. Additionally the cost of living crisis is seeing a move away from purchasing organic and some higher welfare products. The Government needs a clear trade and land use strategy to help food security. On trade as most food is imported from the EU to equivalent animal welfare standards, any trade war with the EU would result in food shortages and increasing imported products not produced to UK standards. These could not be replaced by the six FTAs currently being negotiated. Any intention for the Government to reverse the Agriculture Act 2020 and revert back to old style land are based payments rather than payments to incentivise animal welfare and the environment will not improve food security but could incentivise intensive farming with its damage to animal welfare and the environment. The Government needs to produce a land use strategy which benefits animal welfare, landscape and the environment. It should also move fast to introduce mandatory methods of production labelling, complete changing its procurement standards to safeguard its own production and continue to invest in alternative proteins and alternatives to carbon dioxide for pig slaughter.

1. The RSPCA is pleased to respond to this consultation looking at the food security in the UK. The RSPCA is the oldest and largest animal welfare organisation in the world and writes the standards used by RSPCA Assured, the UK's only animal welfare assurance scheme. RSPCA Assured accounts for 100% of salmon production, around 51% of egg production and 23% of pig production in the UK.

What are the key factors affecting the resilience of food supply chains and causing disruption and rising food prices – including input costs, labour shortages and global events? What are the consequences for UK businesses and consumers?

2. UK is at present around 54% self sufficient in food on the plate<sup>1</sup>, with the remainder being imported. The EU accounts for more than 90% of all beef, dairy, eggs and pork products imported into the UK and nearly two-thirds (65%) of all food and feed not of animal origin. So relationships with the EU are a key factor impacting resilience of the food supply chains for imported food. The UK has yet to apply SPS controls on food imported from the EU, having postponed this twice already and no firm date has been agreed for those controls being implemented. Given the importance of the EU market to exports and imports to the UK it is essential that there is as frictionless trade as possible once the SPS controls are fully put in place.
3. Key factors affecting the food supply chains include the rising cost of energy and fuel, labour shortages and climate change. The rise in energy prices, due in part to the Ukraine war, is also impacting on the rising cost of fertilisers. The war in Ukraine is also a clear impact on the rising costs of wheat although the

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<sup>1</sup> <https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-security-report-2021-theme-2-uk-food-supply-sources#:~:text=About%2054%25%20of%20food%20on,subsequent%20indicators%20will%20set%20out.>

UK does not import significant amounts of wheat or other food stuff from Ukraine. The impact of climate change can be clearly seen from this summer which was officially declared as a drought by the Environment Agency across six regions in England. This is expected to impact on the amount of feed available to farmers during the winter.

4. Trade policy could also impact food prices. Although the UK international trade department is negotiating six FTAs at present along with the two already agreed, these will not be able to replace the food imported from the EU. In addition, food imported from the EU is imported under equivalent animal welfare standards to the UK, contrary to the two FTAs completed with Australia and New Zealand where food can be imported tariff free without equivalence to UK animal welfare standards. This risks undermining the UK's producers and the UK should put in place a set of core animal welfare standards as part of its trade strategy.
5. The energy crisis has also impacted on supply of carbon dioxide after CF Industries paused ammonia production in August at its Billingham plant due to high gas prices. This not only will cause disruption in fertiliser production, it will reduce the availability of carbon dioxide used in the killing of pigs and chickens. The Government had to bail out CF industries in September 2021 when routine maintenance also stopped carbon dioxide production at its now closed Cheshire plant. This resulted in disruption in the pig market with slaughter weight pigs being kept on farm as there was no slaughter capacity in abattoirs. RSPCA Assured accounts for 23% of UK pig production and whilst last year's events did not have a huge negative impact on production and slaughter of RSPCA Assured pigs as abattoir capacity was available through existing contracts, there is concern that a repeat this year could bring further disruption to an industry under pressure from imported pigmeat produced to lower standards. The RSPCA has been urging the UK to look at more humane and sustainable slaughter alternatives to the use of carbon dioxide in pig slaughter and stop its use by 2025. In 2021 the European Parliament voted in favour of funding research in this area and the European Commission has since invested €2 million to find alternatives to carbon dioxide. The disruption to the pig market in 2021 and 2022 caused by the lack of carbon dioxide in the UK highlights the timely need for such an alternative to the slaughter of pigs.

What is the outlook for UK food price inflation in the short and medium term? What policy interventions should the Government consider to manage these pressures?

6. Food price inflation is predicted to rise in the short term. According to the British Retail Consortium, prices in shops rose by 5.1% in August 2022, up from 4.4% in July mainly due to the cost of fertiliser, wheat and vegetable oils, a direct result of the Ukraine-Russia war<sup>2</sup>. Fresh food prices rose by their highest rate, 10.5%, since September 2008. There is no indication the peak of this trend has yet been reached.
7. The opportunities for UK food and farming lie principally in marketing British food as a higher welfare and high quality product. The new farm support and investment system being trialled on animal welfare schemes in 2022 for adoption in 2024 provides the opportunity to reward farmers that produce to higher animal welfare standards. The previous subsidies, inherited from the CAP, given to farmers based on the land they farm, did not encourage higher welfare conditions. Indeed, prior to the Agriculture Act 2020, England allocated no funding to schemes which solely prioritised animal welfare. The Agriculture Act 2020

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<sup>2</sup> BRC Index August 2022 <https://brc.org.uk/news/corporate-affairs/shop-prices-rise-ever-higher/>

provides an excellent framework to set up reward schemes such as the animal welfare/veterinary pathway and animal welfare income foregone streams to promote higher animal welfare standards. This will have the added benefit of also promoting English food as it will enable farmers to recoup any losses they may incur from changing from baseline to higher welfare standards. It will also enable English farmers to compete against any food imported from abroad that is produced under lower standards in the UK and is permitted under new Free Trade Agreements the UK Government signs. Whilst the UK Government has agreed that it will keep funding at the same level until 2024 for the farm support programme, it has yet to allocate funding envelopes for the different programmes (eg ELMS, animal welfare, veterinary pathway). An agreement on what the funding envelopes would be until 2024 would give stability and certainty to farmers and incentives to join those schemes.

8. Mandatory labelling on method of production is another policy intervention the Government should fast track. This would give the British consumer clearer and more transparent information to ensure they can put in practise their demands to choose higher welfare food produced locally. This is also a Brexit dividend as the EU currently does not allow mandatory method of production labelling outside eggs or method of slaughter labelling. The UK Government is now pursuing these opportunities with the release from its call for evidence showing a clear majority in favour of mandatory method of production labelling<sup>3</sup>. The Government has stated that they will go forward with a consultation in 2023 and the RSPCA would like to see it occur in the early part of the year so that it can come into place by 2024.

How will the proposals in the Government's food strategy policy paper affect:

1. the resilience of food supply chains?;
2. the agri-food and seafood sectors?;
3. access to healthy, nutritious food?
9. The Government's food strategy outlines three objectives<sup>4</sup>: to deliver a prosperous food sector by innovating new technologies, to deliver a sustainable food system with access to high quality products through new Government Buying Standards and incentivising farmers to adopt more sustainable activities and deliver export opportunities and consumer opportunities through imports through the FTAs. The RSPCA believes that the Government's food strategy and response to the Dibleby report was a missed opportunity and is not bold enough on measures to protect UK animal welfare standards and farmers from lower welfare imports of animal products.
10. The Food Strategy was developed in response to the Dibleby independent review of the nation's food systems. Amongst the 14 recommendations made in the Dibleby review were some ambitious ideas which would have a positive impact on animal welfare; in particular the development of a set of core standards for animal welfare and the environment which would be used in all the Government's future trade negotiations, and a proposal for a reduction in meat consumption to protect both farm animals and the environment, helping the UK achieve its climate change goals too. The RSPCA is disappointed that neither of these recommendations are accepted by the Food Strategy.

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<sup>3</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1100605/animal-welfare-labelling-summary-of-responses.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1100605/animal-welfare-labelling-summary-of-responses.pdf)

<sup>4</sup> <https://www.gov.uk/government/publications/government-food-strategy/government-food-strategy>

11. A trade strategy which protects our high animal welfare standards is not only vital for the animals used in food production, it's also vital for British farming, to ensure that the products our farmers produce cannot be undercut by cheaper, lower welfare, imports. It is concerning that there is nothing in the Government Food Strategy that will ensure that this is the case and indeed the Government has shown, through the Australia FTA, that it has permitted an increased trade in products such as sheepmeat and beef that are produced to standards illegal or below UK standards. If the Government applies the same strategy to the FTAs it is currently negotiating with India, Canada and Mexico, this could permit increased trade in eggs, porkmeat and chicken that is produced under standards illegal in the UK. Conditional liberalisation based on a set of core standards in trade policy would resolve these concerns.
12. The Government's Food Strategy has nothing to say on reducing consumption and production of meat and dairy products. The RSPCA is disappointed that there are no recommendations on this vital issue, especially given the ambitious recommendations to reduce meat consumption by 30% over the next decade, made in the Dibleby review. We fully understand that it is a complicated and challenging area for any government, but ignoring the issues raised will not make them go away. We are simply storing up environmental and animal welfare challenges for the years to come; and hindering the UK's efforts to meet its climate change and net zero ambitions. The RSPCA and RSPCA Assured scheme both support an *eat less, eat better* strategy which would see consumers reducing their consumption of meat and dairy products, particularly those produced under intensive systems, and switching to higher welfare products.
13. Even in the midst of the cost of living crisis, this is an achievable goal. The RSPCA's recently published [Animal Kindness Index](#) found there was no evidence that considering animal welfare standards in diets is connected to income. Survey results revealed that those with lower household incomes are just as likely to say that animal welfare standards significantly influence their decision as those with higher incomes.
14. Unless there is a significant change to our diets, we are likely to see an unsustainable rise in the number of animals (particularly fish and chickens) farmed for their meat over the coming decades. This will place even greater pressure on already stressed environments, natural habitats and scarce resources as well as the negative impacts on animal welfare of more animals being farmed, potentially in intensive systems.
15. To counteract the potential welfare and environmental impacts we must begin to act now to reduce the number of farm animals - through reducing both consumption and production of meat and dairy products and investing in new technologies such as cultured meat. The Government has the potential to be world leading on research into and bringing to market alternative protein food products as it has already invested £130 million in food research and has committed to further investments in innovative protein development to be at the forefront of this new food resource<sup>5</sup>. The RSPCA supports this investment stream but is conscious that other nations, such as Singapore, have already seen the economic potential of this research.
16. The Government has committed to changing its Buying Standards which at present allow procurement buyers to import food for use in schools, prisons and care homes that has been produced to lower animal welfare standards. The RSPCA does support the Government's proposals in the recent consultation on Government Buying Standards to close this loophole and encourage, through the Government Buying

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<sup>5</sup> <https://hansard.parliament.uk/commons/2022-06-15/debates/5A30DAB4-F309-4DD3-AC8F-EEB6615D4DEC/SustainableFoodSupplyAndCulturedMeat>

Standards, the uptake and production of higher welfare products such as free range eggs.

Is the current level and target of food self-sufficiency in England still appropriate?

17. The Government has not set any targets on food self sufficiency in England and the RSPCA agrees that the setting of such targets is arbitrary and not helpful to the promotion and production of higher welfare and quality food. Although it may be more relevant to examine how England could be self-sufficient in food products it can grow, this is not necessarily a good indicator of high animal welfare standards. Indeed some of the food imported presently to the UK, such as chicken from Thailand, is produced at lower stocking density and so higher welfare standards than is currently the baseline in the UK. The RSPCA supports the production and sale of food in England that is produced to higher animal welfare standards and does not distinguish between the geographical place of production.

How are the rising cost of living and increasing food prices affecting access to healthy and nutritious food?

18. There is concern that the increasing food prices will affect access to healthy food and the RSPCA shares that concern, as well as the concern that there could be declining access to higher welfare food such as free range eggs or RSPCA Assured pigmeat. The RSPCA's Animal Kindness Index found that there was no evidence that considering animal welfare standards in diets is connected to income. Survey results, collected during May 2022 revealed that those with lower household incomes are just as likely to say that animal welfare standards significantly influence their decision as those with higher incomes.
19. Whilst this is what the public are saying and there can be a disconnect between actual behaviour and stated behaviour, there is historical evidence showing the relationship between the consumption of higher welfare products and cost of living. During the previous cost of living crisis following the banking crisis in 2008-10, sales and consumption of RSPCA Assured products did not decline, although there was evidence that sales of organic food fell. Indeed for some sectors, such as pigs, ducks and eggs, year on year growth in numbers of animals covered (2010/11) occurred; 20%, 4% and 11% respectively. In every year since mandatory labelling of eggs was introduced in 2004, sales of free range eggs have continued to rise, including during the banking crisis and the Covid pandemic.
20. RSPCA Assured is starting to see some signs of the relationship between the cost of living crisis and sales of RSPCA Assured products. Sales data only goes to Q2 at present so Q3 figures may provide a better insight.  
Sales of RSPCA Assured chicken are considerably down at one major retailer but the reasons for this are probably due to the pricing policy of the retailer. As the price of the 'value' chicken tier is matched by many retailers to the price offered by other retailers (invariably set at around £3), but their higher tier chicken isn't, this means that the gap between these products continues to rise and it is now between £9-12 for a higher welfare or organic chicken. Consumers are making their choice based on this gap.
21. As we saw in 2008-10 sales of organic chicken are down, with some estimates showing a 40% YoY decline. Some trading down to RSPCA Assured (e.g. Tesco's Room to Roam range) was initially picking up additional sales, but sales of this are also coming down as the gap between higher welfare and value chicken grows. In September, sales of RSPCA Assured chicken in one store was 20% down versus last

September. Some retailers are already moving away from organic completely.

22. However sales in other products are holding up better. Sales of RSPCA Assured pork products rose 14% from Q1 to Q2 this year although they are 2% down on Q2 in 2021. There is no sign as yet of the impact of cost of living leading to a decline in sales of free range eggs which were 1.5% up in Q2 compared to a decline in the sale of caged eggs across all retailers. Aldi reported a 16% increase in the sale of caged eggs. This is reassuring and shows the impact of cost of living is not index linked to the price of the products. As RSPCA Assured is responsible for 51% of all eggs produced in the UK and 23% of all pork and pigmeat, this is a reassuring picture.
23. There is a link between the number of product lines being offered by the retailer in store and sales of products. During Q2 and Q3 the number of product lines has retracted with some retailers no longer stocking mid tier lines or even moving away such as the decision by some retailers not to stock organic any more. With no end in sight to the cost of living crisis, and customer confidence at record low levels, retailers are under significant pressure to find additional savings so Q3 and Q4 figures will undoubtedly give better information on trends.

How could the Government's proposed land use strategy for England improve food security? What balance should be struck between land use for food production and other goals – such as environmental benefit?

24. The Government's Food Strategy commits the Government to produce a land use strategy by next year. A land use framework for England should provide national strategic planning for all land uses, with the primary aim of achieving sustainable land use and the promotion of good animal welfare. A national strategy should put multifunctional land use at its heart and consider all land uses, including nature, agriculture, development, recreation and built infrastructure to ensure sustainable land use.
25. By integrating land use planning with agricultural land use decisions and policies, a land use strategy for England is an opportunity to tackle development pressures and poor agricultural management to deliver food production and other land uses including for environmental benefit. By reserving the best agricultural land for regenerative higher animal welfare food production the benefits of food production can be integrated whilst promoting good animal welfare. There are a number of examples where good animal welfare standards can go hand in hand with food production and environmental benefit. For instance RSPCA Assured eggs produced under Woodland Trust standards provide biodiversity benefits<sup>6</sup> demonstrated in new research carried out in 2022 for the Woodland Trust.
26. The UK's land use strategy should highlight the environmental, landscape and animal welfare benefits of pasture fed grazing animals. Animal feed demand is putting pressure on UK land. For instance, wheat and barley grown to feed farmed animals uses 2 million hectares of land or 40% of the UK's arable land area.<sup>7</sup> It is not sustainable to continue with this level to secure as there will be conflicts between for instance intensive dairy supply and meeting the UK's net zero target. Globally, intensive livestock farming alone is already estimated to be responsible for 30% of anthropogenic-caused biodiversity loss, in addition to

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<sup>6</sup> <https://www.woodlandtrust.org.uk/press-centre/2020/11/poultry-farm-wildlife-havens/>

<sup>7</sup> <https://www.wvf.org.uk/press-release/transform-uk-farmland-boost-food-resilience-tackle-nature-crisis#:~:text=Wheat%20and%20barley%20grown%20to,the%20UK's%20arable%20land%20area.>

damage caused to the climate by methane emissions<sup>8</sup>. A move away from intensive farming to extensive pasture grazed livestock will produce environmental and animal welfare benefits (RSPCA welfare standards have a minimum of 120 days annually on pasture for cattle to qualify under the RSPCA Assured scheme). It also maximises utilisation of feed with crops grown being eaten directly by humans rather than fed to animals kept indoors and then converted into animal products. So by increasing plant consumption and reducing animal product consumption we can effectively feed more people with the same land-area. Permanent pasture, especially within regenerative systems, maintains soil integrity and stores carbon.

27. Some retailers are linking their farming requirements to improving pollinator populations, by making it a requirement to be LEAF accredited and managing a minimum amount of farm area for wildlife to increase bee numbers for pollination<sup>9</sup>. There is a natural cross over to farm payments available under ELM and this should be recognised in the land use strategy.
28. Rumours that the Government will reverse the intentions of the Agriculture Act 2020 by reintroducing land based payments rather than payments to reward animal welfare and the environment under ELMS are concerning and would do nothing to improve food security. Ironically the UK left the EU's Common Agricultural Policy because it could not convince the other EU members that a land based payment policy was bad for animal welfare and the environment. Paying farmers on the size of their farm rather than on the policies they adopt to improve landscape, the environment or animal welfare resulted in intensification of farming and ultimately to the destruction of the environment and reduction in biodiversity. The Agriculture Act 2020 cemented this move towards a more sustainable and extensive method of farming in England and in the two years subsequent to its adoption, a lot of planning work has been undertaken to ensure ELMS is fit for purpose and can reverse the decades of decline in the environment and biodiversity in the past forty decades. This should be completed and enacted rather than destroyed.

September 2022

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<sup>8</sup> <https://www.unep.org/news-and-stories/story/methane-emissions-are-driving-climate-change-heres-how-reduce-them>

<sup>9</sup> <https://www.marksandspencer.com/c/food-to-order/not-just-any-food/food-news/the-bee-blog>