

Written evidence submitted by the RSPCA (FFS0002)

RSPCA RESPONSE ON THE EFRA CONSULTATION ON THE FOOD SUPPLY CHAIN

1. The RSPCA is pleased to respond to this consultation looking at the food supply chain and the role of the Grocery Adjudicator 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 90% of salmon production, around 51% of egg production and 23% of pig production in the UK.
2. UK is at present around 62% self sufficient in food on the plate and 75% for indigenous produced food¹, 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 UK does not import significant amounts of wheat or other food stuff from Ukraine.
4. Trade policy could also impact food prices. Although the UK's Department of Business and Trade department is negotiating eight FTAs at present along with the three already agreed and ratified, 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 the CPTPP 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 stopped ammonia production in August 2024 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%

¹ <https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2024#:~:text=The%20UK%20Food%20Security%20Report,analysis%20of%20UK%20food%20security>.

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. The UK is also undertaking research into alternatives for CO².

6. The RSPCA believes that the Government could give clear guidance to importers and consumers by introducing mandatory method of production labelling (MOPL) on products sold in Great Britain. For instance the UK already has MOPL on shell eggs and fish caught at sea and has given its intention to consult on bringing in MOPL on poultry and pigs. This would give clear guidance to the consumer of the provenance and how that product was produced. In July 17 2023 the previous Government paused their consultation on MOPL despite agreeing it had public support and then restarted it in January 2024. However nothing was agreed before the election was called and the present Government has not made it clear when it will release the results of the 2023 consultation and what steps it would take as a result. As MOPL would have assisted in giving consumers information on any imported products, the scrapping of labelling will hamper the ability of consumers to choose UK products based on animal welfare standards and could see the impact of FTAs increased.
7. The Government has stated that it wishes to update its procurement standards, which at present allow imports of products produced at standards below the UK's. As the UK Government spends around £2.4 billion annually on procured food for prisons, education and defence, it is essential that it ensures such food is produced to UK standards and does not undermine British farmers. In June 2021 the previous Government responded to the EFRA Committee report on food procurement that it wished to update its procurement rules including removing the exemption that allows it to buy from overseas to lower standards and that it was going to consult on these proposals in the summer of 2021. No consultation or proposals on new standards have yet occurred although the previous Government produced a report on procurement just before the 2024 election². 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 2023 consultation on Government Buying Standards to close this loophole and encourage, through the Government Buying Standards, the uptake and production of higher welfare products such as free range eggs.

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² <https://www.sustainweb.org/assets/independent-review-into-public-sector-food-procurement-may24-1717154707.pdf>