

Written evidence submitted by FOUR PAWS UK (FOF0005)

The Future of Farming

FOUR PAWS UK evidence submission to EFRA committee inquiry

<https://committees.parliament.uk/work/8722/the-future-of-farming/publications/>

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1. Introduction

1.1 FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. As experts in animal welfare, we will be responding to this call for evidence with our own knowledge and expertise on the issues raised and what impact this could have on animal welfare.

2. Defra's farming and countryside programme (Environmental Land Management Schemes)

2.1 The move away from the EU's Common Agriculture Policy (CAP) to a farm subsidy scheme based on the principle of 'public money for public goods' was a much-cited potential benefit of the UK's departure from the EU which received qualified Labour support. However, Environmental Land Management Schemes (ELMS) have been criticised as being overly complex and underfunded. The roll-out has been slow, with full implementation of payment by welfare results only "possibly" foreseen in 2025 at the earliest. In particular, the level of capital support that will be provided for assisting farmers in moving away from lower animal welfare keeping systems (e.g. farrowing crates) and up the welfare scale (i.e. to fully cage free systems such as free farrowing) remains unclear.

2.2 For the Animal Health and Welfare payments to deliver genuinely high standards, the Government must ensure that the farm support programme is transformative and encourage significant uptake and assist all farmers to transition to higher welfare systems within a recognised transition period. ELMS should proactively steer and support farmers towards a less intensive and more sustainable agroecological approach, otherwise progress towards better and sustainable farming practises, as well as achieving net zero targets, will stagnate.

2.3 FOUR PAWS UK believes that a specific proportion of the ELMS farm subsidy budget (e.g. 20%) should be allocated to the Animal Health and Welfare Pathway, which would equate to just under £500m/yr. being ring-fenced for improving farm animal welfare.

3. Food security

3.1 To ensure food security as well as address the triple planetary crisis and its interconnections with animal welfare, we must address our over reliance on industrial livestock production, which would also serve to mitigate against known associated public health risks. Instead, we must move towards more sustainable and ethical food systems and farming practices and make these choices more accessible to the consumer through honest labelling schemes and ensuring affordability. Industrial livestock production is an unjust system for people, animals and the planet. Globally, people do not have equal access to land, often experience poor working conditions, and are victims of environmental degradation. This kind of intensive agricultural system also diverts food from human consumption to animals, through globalised agribusiness supply chains, as well as causing environmental degradation and wildlife harm, public health risks, and widespread animal welfare violations. Its impacts are crosscutting in nature and addressing them requires a systems-based view.

3.2 There is a strong appetite for change within the farming community, and many farmers have already adopted ‘better’ or ‘best’ practices. However, industrial livestock production has created numerous barriers to achieving this transition. Some of the cruellest systems, like cages used in intensive farmed animal production, are key systems that must be disbanded if we are to prioritise animal welfare, environmental health, and social equity in food systems.

3.3 Every year in the UK, around 8 million farm animals are cruelly confined to cages for all or part of their lives. This is despite well-established, economically viable, higher-welfare alternatives existing. There is a wealth of scientific evidence demonstrating that hen welfare is compromised in ‘enriched cages’ which severely restrict many key natural behaviours and allow for little more space per hen than an A4 sheet of paper. This matters because animals are sentient beings. The phasing out of hen cages has been widely expected for some time and other countries have already taken the lead. The Government must seize the opportunity to position Britain as the global leader on farm animal welfare by phasing out farrowing crates and enriched cages and the first step is to immediately publish a consultation on this matter.

3.4 Chicken welfare is a significant concern in British farming, and there is an urgent need for the Government to raise standards by: reducing stocking densities; using slower growing breeds; and improving housing and slaughter standards. The Better Chicken Commitment is the leading set of standards for broiler welfare, responding to rising consumer expectations for animal welfare, sustainability, and food quality, and we ask that the Government commits to making these voluntary standards mandatory.¹

3.5 While nobody opposes the use of antibiotics to treat individual sick animals, routinely administering antibiotics in the absence of disease to compensate for poor welfare, keeping conditions and practices, and the import of animal products produced using antibiotic growth promoters, poses a direct threat to human health via the emergence of antimicrobial resistance

¹ <https://betterchickencommitment.com/uk/>

(AMR). Routine preventative use was banned in the EU in January 2022, but Britain has failed to match this.^{2,3} The Government must bring forward legislation in line with the EU and avoid lagging behind in steps being taken to mitigate against increased risks to human health.

3.6 Whether we improve systems or retain standards as they are, we need to give consumers greater transparency and the ability to make informed choices with their purchasing by introducing a mandatory animal welfare labelling scheme. Consumers are currently unable to reliably assess the welfare background of animal products which do not have a standard label even if they wish to (schemes such as Red Tractor are not mandatory and mostly fail to guarantee higher animal welfare), and this impacts negatively on animal welfare and consumer choice. It is also a barrier to progress as farmers operating to higher standards do not have an obvious way to verifiably differentiate their products for consumers. The Department for Environment, Food and Rural Affairs (Defra) ran a Call for Evidence on animal welfare labelling in 2021, with clear proposals to introduce this labelling, which is practically ready to go. The Government should introduce animal welfare labelling, so that consumers start to see it on packaging within two years.

3.7 Britain needs a robust, sustainable food strategy which improves diet, provides certainty for British farmers, raises welfare standards, provides food security, and reduces reliance on imported soya and grain. The current government food strategy failed to adopt numerous evidence-based recommendations from Henry Dimbleby's National Food Plan including the interconnectedness of intensive livestock production and greenhouse gas emissions, and how the long-proven idea that meat reduction plays a critical role in a sustainable food system.⁴

3.8 Extremely high volumes of meat and animal products are being consumed around the world, and this is having devastating effects on animals, our health and the environment. To be in line with the planetary boundaries provided by the renowned EAT Lancet Commission, Europe needs to cut its average meat intake by a staggering 70%, or, in other words: completely cut out meat from the menu from April onwards until the end of the year.⁵ According to a FOUR PAWS report, 'Meat Exhaustion Day' - in the UK the day when the average annual consumption of meat in a country, a region or worldwide exceeds the amount of meat intake recommended by the Commission - falls in April, well before the global average of June.⁶

3.9 The Government must strengthen the national food strategy by committing to improve farmed animal welfare, phasing out some of the cruellest systems, halting the growth in intensive

² Veterinary Medicines Regulations 2024, <https://www.legislation.gov.uk/ukxi/2024/567/contents/made>

³ <https://www.saveourantibiotics.org/news/press-release/new-law-banning-routine-use-of-farm-antibiotics-flawed-by-major-weaknesses-and-loopholes/>

⁴ <https://www.nationalfoodstrategy.org/>

⁵ <https://eatforum.org/lancet-commission/eatinghealthyandsustainable/>

⁶ FOUR PAWS Meat Exhaustion Day report https://media.4-paws.org/5/b/e/7/5be7f16e7dc053e4117e27e31398d0d95d76cbcd/2023-04-20_meat-exhaustion-report_A4_WEB.pdf

livestock production and instead set clear meat reduction targets, as well making more plant-based food available, subsequently supporting British produce. As a member of the Eating Better Alliance, a group of over 70 NGOs from farming, animal welfare, food security, environment and health charities, we have come together to support the *The Better by Half Roadmap* where we want to see actions that move us towards producing and eating less and better meat and dairy (50% reduction by 2030), and creating a food system that is fairer, healthier and more sustainable for people, animals and the planet.⁷ The Eatwell Guide, which provides food-based guidance for eating a nutritious, balanced diet, fails to include advice around meat reduction and alternative proteins. The guide, and its associated advice, must be updated to explicitly include sustainability as well as cultural relevance.⁸

3.10 The Government Buying Standards for Food (GBSF) outline clear and promising guidelines that encourage high welfare and an overall reduction of animal products. However, as it stands, these are only voluntary standards if it proves too costly. With the UK spending around £2.4 billion each year on public procurement of food and catering services for public institutions such as schools, hospitals, care homes and prison, it is vital that public procurement is used as a lever to support the rural economy and help farmers who are using higher welfare and sustainable practices but are often undercut by cheap imports as a result of bad trade deals.⁹ The Government must make the GBSF mandatory across the public sector in England, including in schools and local government.

4. Innovation and Agri-Tech

4.1 There have been calls for change within the industry to use new technology and innovation in order to reduce greenhouse gas emissions within the farming sector and to improve animal welfare. However, there are serious concerns with many of these technology ‘fixes’. Feed additives are one solution, according to the industry, with the methane-inhibiting additive 3-NOP (also known as Bovaer) being administered in Europe and North America.¹⁰ 3-NOP has been shown to have limited effect when fed with high-cellulose diets, or grass-fed cows, and tends to have a higher methane-inhibiting effect when fed with high-energy diets, such as cows fed with pellets in indoor systems. Due to a lack of any long-term studies, the full effects are not yet known and therefore caution must be taken when suggesting additives as a quick fix. Some feed additives, such as nitrate, could have harmful effects at high dosages, and the long-term effect of these methane-inhibitors on the cows’ rumen health is unknown. It’s also possible that some feed additives could have adverse effects on the environment in their production and/or extraction in terms of land use change, energy use, and water/air pollution. Red seaweed is another proposed

⁷ https://www.eating-better.org/site/assets/files/10509/better_by_half_roadmap_pdf_1.pdf

⁸ <https://www.nhs.uk/live-well/eat-well/food-guidelines-and-food-labels/the-eatwell-guide/>

⁹ <https://committees.parliament.uk/work/370/public-sector-procurement-of-food/publications/#:~:text=In%202014%2C%20Defra%20published%20%E2%80%9CA,food%20procurers%20of%20public%20bodies.>

¹⁰ <https://www.reuters.com/fact-check/feed-additive-bovaer-is-approved-eu-contrary-online-claims-2024-12-13/>

alternative; however, it contains bromoform - a known carcinogen – and needs to be produced in large indoor tanks, leading to a higher carbon footprint.¹¹ The methane-inhibiting mitigation strategy fails to address the fact that we must reduce overall emissions and instead aims to uphold business as usual rather than transitioning to a more holistic agrifood system.

4.2 Recently, the first ‘low methane’ calf was bred via IVF in Scotland.¹² Breeding based on one trait alone often leads to a many other unwanted outcomes and animal health and welfare issues. These issues have previously been seen in farmed animals bred for productivity (i.e. dairy cows with metabolic issues or genetic diseases, beef cattle such as the Belgian blue with birthing issues due to their muscle mass). We strongly advise against breeding for low-methane emissions. Instead, we should be breeding resilient, local breeds that are better adapted to their environment and climate conditions.

4.3 In many countries, anaerobic digesters to produce biogas from manure and organic waste are being subsidised on farms. This presents concerns as it attributes an economic value to manure and can create perverse incentives to increase herd sizes. The manure needs to be collected regularly to fill the digesters, which is easiest when the animals are kept indoors, specifically on slatted floors, which also presents welfare concerns. In practice, it has been shown that crop residues are often transported in trucks to the digesters, or crops are grown for the sole purpose of biogas, meaning it is not as "green" as it is intended to be. Again, it leads to further intensification and disregards the need for a holistic transformation of our farming systems.

4.4 Cultivated meat uses stem cells taken from a live animal and propagated in a bioreactor, resulting in real meat. Cultivated meat is a potential alternative to traditional meat but allows for a reduction and possible elimination of the suffering of farmed animals in intensive farming systems, potentially radically reducing the number of farmed and slaughtered animals in the long term. There are welfare concerns of the animals being bred, kept and treated for the use of cultivated meat whereby the process of obtaining the initial animal cells needed for cultivation often involves a biopsy taken from a living animal, which could cause potential pain and stress on the animal involved; and ethical concerns have been raised in cases where Foetal Bovine Serum (FBS) has been harvested from unborn calves. However, further research and development is needed into cultivated meat and support of cultivated meat that has been grown with plant-based and synthetic Animal Component-Free (ACF) growth media instead of Foetal Bovine Serum (FBS) and from donor animals whose excellent welfare is ensured.

4.5 FOUR PAWS has serious concerns about gene editing, as it poses significant ethical and welfare concerns for farmed animals. Gene editing will push farmed animals to their physical

¹¹https://www.researchgate.net/publication/339633201_Mitigating_the_carbon_footprint_and_improving_productivity_of_ruminant_livestock_agriculture_using_a_red_seaweed

¹²<https://www.sruc.ac.uk/all-news/cool-calf-could-help-accelerate-dairy-journey-to-net-zero/#:~:text=Hilda%20is%20the%20first%20Langhill%20Herd%20calf,arrived%20eight%20months%20earlier%20than%20previously%20possible>

limits – growing bigger and faster, exacerbating the severe welfare problems that we know already exist through selective breeding for increased productivity. Chickens are already forced to grow so big for their meat that they endure painful leg disorders, and dairy cows are pushed to produce such large quantities of milk that they suffer lameness and premature infertility, leading to premature deaths. A dairy cow in a UK intensive system typically has a much shorter lifespan compared to a cow in a higher welfare system, with intensive systems often culling cows after around 5.5 years (after 2-3 lactations) while higher welfare systems may allow cows to live closer to their natural lifespan of around 20 years; this is because intensive systems prioritize high milk production, leading to faster physical decline and earlier culling.¹³ Gene editing will perpetuate this suffering under the guise of ‘efficient farming’ and improved food security, at the expense of an animal’s welfare.

4.6 Gene editing can be used to improve disease resistance in farmed animals. It is true that this could be beneficial for diseases that do not arise from the intensive conditions of factory farming. However, many diseases arise from keeping animals in overcrowded and stressful conditions. Rather than using gene editing to mask the adverse health effects and perpetuate factory farming, we should be improving the conditions farmed animals are kept in.

5. Land use

5.1 Approximately 1.1 billion land animals are killed for food annually in the UK alone and an estimated 80% are reared on factory farms: mostly pigs, chickens, and dairy cows. Factory farming typically involves the extreme confinement of livestock, the subjecting of animals to painful and unnecessary procedures, such as tail docking, teeth clipping and beak trimming.

5.2 Factory farming is spreading, with intensive livestock production continuing to rise, and comes with significant costs to our climate, environment, and health, including greenhouse gas emissions, environmental and habitat degradation, and a prevalent risk of zoonotic disease outbreaks. When land is used to raise animals and produce animal feed instead of growing crops for direct human consumption, precious water and soil are lost, trees are cut down to clear the land for feed production and factory farms and untreated animal waste pollutes rivers and streams.

5.3 There is an urgent need for a reform of the permitting system of livestock farms to mitigate the impacts of intensive farming, including animal welfare and environmental damage. The current processes intended to regulate intensive livestock farming are not fit for purpose and are failing to prevent mounting harm. FOUR PAWS UK recommends an ‘enhanced environmental permitting system’ to bring intensive livestock farming regulations up to scratch, to be established through new primary legislation and administered by the Environment Agency. The

¹³ <https://www.compassioninfoodbusiness.com/transforming-animal-welfare/dairy/#:~:text=They%20have%20an%20average%20lifespan%20of%2020,milk%20for%2010%20months%20of%20the%20year.>

new system, featuring both lower permitting thresholds and more rigorous operating standards, will deliver on multiple cross-departmental priorities and provide an effective policy solution for a resilient, just transition to nature-friendly farming by facilitating nature recovery, climate mitigation, animal welfare advances, improved public health and a fairer deal for farmers.

5.4 Intensive indoor livestock production should not be seen as a solution to opening land for greater biodiversity i.e. through rewilding, but instead an overall reduction on our dependence on livestock farming, and a greater support for arable farming, should be the transition the Government supports.

6. Animal welfare

6.1 To be truly global leaders in animal welfare, worldwide, we must constantly work to review and transform our relationship with animals. Although we have some of the highest animal welfare standards in the world, our current food and farming system supports a greater level of animal suffering and confinement than we may acknowledge. Factory farming is on the rise and climate mitigation plans, biodiversity assessments and pandemic prevention plans are all failing to address the issue of animal welfare. When they suffer, we suffer.

6.2 The Government must commit to ending the unnecessary cruelty and suffering of farm animals by ensuring they are raised humanely and reduce its support for intensive livestock production. By re-educating the farming industry on the humane treatment of animals and the vast benefits of farm animal welfare for the planet and human health and wellbeing, the unnecessary suffering of farm animals can be prevented. High-welfare farming can also be lucrative, but to create change, we must shift attitudes toward the treatment of farm animals and ensure that they have a ‘good’ life, able to express their natural behaviours and have positive experiences as measured by the Five Domains model.¹⁴

6.3 Our exit from the EU has afforded the UK with an opportunity to not only improve our own animal welfare standards, but also positively impact and ideally drive up the standards of animal farming in other countries.

7. Trade

7.1 As we saw with the UK-Australia trade agreement and with the trans-Pacific trade agreement (CPTPP), the UK is prepared to allow the importation of animal products that would be illegal to produce in the UK, including eggs produced in intensive battery farm systems and pork produced in sow stalls. As these practices are often cheaper, the imported products inevitably undercut British-produced food, resulting in our farmers being put not just at a financially competitive disadvantage, but risking their financial viability, simultaneously jeopardising our food security and handing unjustified benefits to lower welfare international food producers. Whilst impact

¹⁴ <https://vet.ed.ac.uk/sites/default/files/2024-09/5%20Domains%20Model.pdf>

assessments have found increased bilateral trade between the participating countries, which could in turn result in potential economic benefits like higher GDP, in fact it is impossible to know true impact until 10 years due to gradual tariff reductions with danger being that it could lead to a race to the bottom.

7.2 2022 polling found that 77% of UK adults believe imported food should meet UK environmental and welfare standards and the Climate Change Committee wrote to the Government last year urging them to protect farmers from “cheap, high carbon food imports”.¹⁵ The animal welfare sector and the NFU unanimously agree that Britain should set core minimum standards for animal welfare as a condition in trade tariff or quota-free access.

7.3 The Government must adopt a trade policy that protects and promotes the UK’s high animal welfare standards. By commissioning a comprehensive UK trade strategy to underline the importance of core standards and promote trade in higher-quality, sustainable goods, it would help to reverse a “race to the bottom” where our higher-welfare British producers are currently disadvantaged. The UK should resist calls for 'regulatory coherence' with countries that have lower welfare standards. If nations with lower standards seek a level playing field, it will make it very difficult for the UK to adopt good new legislation on farm animal welfare and may create pressure on the UK to dilute its existing standards. It is therefore vital that the UK uses its influence as a trading partner to instead bring other nations' standards up to meet our own.

7.4 The Government should introduce a red line in all trade deals including: a clause in each FTA, requiring imports to meet UK animal welfare standards, increased Parliamentary scrutiny and a commitment to resist regulatory coherence.

8. Conclusion

8.1 FOUR PAWS UK’s submission as set out above reflects the Government’s concern about food security, climate change and the need for transformational change in our food and farming systems to promote animal welfare, climate mitigation and environmental protection. The measures proposed here will, if adopted, help protect the welfare of animals, the environment and the health and wellbeing of the public.

FOUR PAWS UK

¹⁵ <https://www.hsi.org/news-resources/over-three-quarters-77-of-uk-voters-want-to-see-the-government-ban-fur-imports/>