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Consultation – Summary of Responses

Code of Practice for the Welfare of Pigs

July 2020

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Contents

Executive Summary 4

1. Consultation exercise 5

 1.1 Background Information 5

 1.2 Public Consultation..... 6

 1.3 The Consultation Questions..... 6

2. Responses to the Consultation..... 8

 2.1 Question 1 8

 2.2 Question 2 14

 2.3 Question 3 14

 2.4 Question 4 15

3. Next Steps 15

Annex A - List of organisation which responded to the consultation 16

Executive Summary

- The twelve week public consultation on the revised Code of Practice for the Welfare of Pigs (the 'Code') was launched on 2 March 2020. The consultation was published on the Welsh Government website.
- The consultation gave industry, enforcement agencies, specialist interest groups, and the general public the opportunity to comment on the revised Code.
- Respondents were asked to consider the style, layout and content of the Code, and any impact on the Welsh language.
- There were five responses to the consultation.
- Comments were welcome on any part of the Code. Respondents made recommendations for improving the style and content, including the information, advice and guidance contained within the Code.

1. Consultation exercise

1.1 Background Information

The Code applies to Wales only. It replaces the Code of Recommendations for the Welfare of Livestock: Pigs, issued in 2004.¹ The Code applies to all farmed pigs, whether they are being kept for breeding, growing and/or finishing, whether they are “wild” type or Eurasian boar kept in a farm (or exhibition / farm park) environment, and whether kept singly or in multiples. The Code is intended to help owners/keepers of pigs to comply with animal welfare legislation, however, it is not intended as a replacement for advice from a veterinary surgeon or an expert technical advisor. Furthermore, whilst many of the provisions of the Code are specific to an on-farm environment, others may offer valuable insights relevant to anyone who keeps pigs, including those keeping companion/“pet” pigs.

The Welfare of Farmed Animals (Wales) Regulations 2007 lays down the conditions under which all farmed animals, including pigs, must be kept (Schedule 1). They also specify additional conditions that only apply to the keeping of pigs (Schedule 8). Some of the specific legal requirements are repeated in boxes throughout the Code. The Council of Europe has also made recommendations concerning farmed pigs. Where these are not already set out in legislation, they are reflected in the Code.

There are also licensing requirements for Old World pigs (family Suidae), such as wild boar and warthog under the Dangerous Wild Animals Act 1976 which may apply. Other legislation (for example, in relation to welfare at time of killing, welfare during transport, or animal identification) may be relevant to pig welfare. Expert advice, such as from a veterinary surgeon or expert technical advisor, should also be sought. See Annex 1 of the Code.

The relevant animal welfare legislation applies to owners as well as to anyone who is responsible for a pig, whether on farm, during transport (including loading and unloading) and at the point of slaughter. This includes anyone given temporary responsibility for pig care, including a veterinary surgeon. A written contract for both permanent staff and third parties contracted to carry out specific roles, such as on-farm killing, can be useful in making sure that everyone involved is clear about their animal welfare responsibilities. However, the obligations imposed by law will still apply, whether or not a contract exists.

Certain aspects of livestock husbandry can present hazards to the health and safety of the stock-keeper. Advice on such matters is available from the local Agricultural Safety Inspector of the Health and Safety Executive.

Pigs are inquisitive, social animals and adapt well to different environments, but careful supervision is still important when changes are introduced at different stages of rearing. Pigs can be kept in a range of rearing environments, from those reared wholly outdoors to those reared in indoor units. Meeting pigs’ welfare needs in these different environments presents different challenges for owners/keepers.

Pigs should receive appropriate and positive human handling from an early age. They should react inquisitively towards humans, including those they are not familiar with. However, they should not be used for public spectacles or demonstrations if such use is

¹ Code of Recommendations for the Welfare of Livestock: Pigs (2004):
https://gov.wales/sites/default/files/publications/2017-11/pig-welfare-code-of-practice_0.pdf

likely to be detrimental to their welfare, including their health. In addition to movement licences, there are also licensing requirements associated with exhibiting animals to the public for educational or entertainment purposes in the course of business.

It is important that animal welfare should be considered before installing any new equipment. The husbandry system used and herd size must be appropriate for the pig breed and any environmental restrictions on the land, including farm size. Staff time available and their skill / competence to manage the particular system will also influence this. New building or equipment design or any environmental or other management changes should aim to maintain or improve welfare.

1.2 Public Consultation

The twelve week public consultation on the Code was launched on 2 March 2020.² The consultation was published on the Welsh Government website and was available in different formats on request.

The consultation gave industry, enforcement agencies, specialist interest groups, and the general public the opportunity to comment on the revised Code.

The Code is intended to encourage all those who are responsible for pigs to adopt the highest standard of husbandry. It explains what a person needs to do to meet the standards of care the law requires. Essentially, if you own or are responsible for an animal you have a legal duty to take reasonable steps to ensure its welfare needs are met. We are grateful to representatives from the industry who assisted in the preparation of the Code.

1.3 The Consultation Questions

Respondents were asked to consider four questions:

1. Question 1:

This consultation seeks views on the style, layout and content of the code and the information, advice and guidance they contain. It is important that you give as much information and evidence as possible to support your opinion. This will help us improve the accuracy and quality of The Code. Comments are welcome on any part of The Code.

2. Question 2:

We would like to know your views on the effects that The Code of Practice for the Welfare of Pigs would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English. What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?

3. Question 3:

Please also explain how you believe the proposed policy The Code of Practice for the Welfare of Pigs could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and

² Welsh Government, Consultation on the Code of Practice for the Welfare of Pigs (2020): <https://gov.wales/code-practice-welfare-pigs>

on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

4. Question 4:

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

2. Responses to the Consultation

There were five responses to the consultation. Three were submitted via email and two via the online survey. The organisations which responded are listed at Annex A.

Not all respondents answered every question. Where this was the case, and for the purpose of this document, the responses have been allocated to the questions where they best fit. In addition, where respondents did answer the specific questions, parts of those answers may have been reallocated to another question where they best fit.

2.1 Question 1: This consultation seeks views on the style, layout and content of the code and the information, advice and guidance they contain. It is important that you give as much information and evidence as possible to support your opinion. This will help us improve the accuracy and quality of The Code. Comments are welcome on any part of The Code.

Section 1 – Recommendations applying to all pigs

Loading, unloading and transport

- *‘To strengthen this section of the document, we strongly recommend that the code should require that all third parties and owner/keepers responsible for the transport of pigs are familiar with the Humane Slaughter Association’s guidance on the [Transport of Livestock](#) and our position on the [welfare of livestock during transport](#).’ (British Veterinary Association)*

Animal-based measures

- *‘We support the animal-based approach. Evidence based indicators of positive welfare should be incorporated into welfare outcome assessments when possible, as promoted by the Farm Animal Welfare Committee (FAWC)’s “good life” framework. For example, behavioural opportunity for animals can be a key differentiator between some assurance schemes, which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes. The standardised assessment of health and welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct assessment’. (British Veterinary Association)*
- *‘To improve clarity and understanding, consideration should be given to using the term “outcomes-based” rather than “animal-based”. “Outcomes” contrasts more clearly with the “inputs” mentioned in paragraph 46, and reflects the language being proposed for postCAP agricultural policy in the recent “Sustainable farming and our land” consultation’. (British Veterinary Association)*

Fighting and aggressive behaviours

Paragraph 50: If identified, persistent aggressors must be removed promptly and pigs with serious injuries must be removed to a hospital pen for treatment and recovery or be humanely killed as soon as possible. See Annex 1 and paragraphs 166 to 168.

- *‘This paragraph does not mention who should treat the pigs in the hospital pen. If the injuries require more than medical treatment/minor surgery (not involving entry into a body cavity), then treatment would be reserved for a veterinary surgeon only. Given that this paragraph references ‘serious injuries’ which could require treatment beyond what the exemption provides for, we suggest adding a note that anything beyond medical treatment/minor surgery (not involving entry into a body cavity) is reserved for a veterinary surgeon.’* (The Royal College of Veterinary Surgeons)

Lameness and limb lesions

Paragraph 57: Pigs that are unable to walk independently without pain and those that have a severe open wound or prolapse are considered unfit to transport. Sick or injured animals may be considered fit for transport if they are slightly injured or ill and transport would not cause additional suffering: in cases of doubt veterinary advice should be sought. If a lame animal does not respond to treatment following veterinary advice, it must be humanely killed on farm as soon as possible rather than leave it to suffer. See paragraphs 62 to 66.” 11.

- *‘We consider that making euthanasia a requirement after poor response is unjustified – it would be more appropriate for the paragraph to read ‘seek further advice from the veterinary surgeon or consider culling’.* (British Veterinary Association)

Managing sick and injured animals

Paragraph 58: Immediate action must be taken if any pigs appear to be ill or injured. A veterinary surgeon should be consulted if there are any doubts about the cause of the ill health or the most effective treatment, including appropriate pain relief.

- *‘This could be interpreted as supporting farmers in making their own diagnosis and deciding themselves what the appropriate treatment should be, which is not permitted under the VSA (1966). We recommend that this is reworded so as to avoid the suggestion that farmers can diagnose/decide on the most appropriate treatment.’* (The Royal College of Veterinary Surgeons)
- *‘We welcome the code’s recommendations to seek appropriate veterinary advice where relevant and ensure that veterinary advice is available when needed... The text should clarify that owners and keepers can achieve what the document sets out with relevant advice and expertise from appropriately qualified professionals, such as their veterinary surgeon, as opposed to requiring that owners and keepers possess all the skills listed in the document themselves, in isolation’* (British Veterinary Association)

On farm killing

- *‘There are many other sources of information on this very important area of pig welfare e.g. those from the [Humane Slaughter Association](#). We recommend that these are referenced in the document.’* (British Veterinary Association)

Responsible medicines usage and record keeping

Paragraph 69: Only UK authorised veterinary medicinal products may be used and they must be administered according to the manufacturer’s instructions. Any variation must be under veterinary direction.

- *‘We recommend changing the last two lines to say that POM-V medicines must be prescribed by a veterinary surgeon and administered in accordance with veterinary advice, and unauthorised veterinary medicinal products or authorised human medicinal products may only be used if prescribed by a veterinary surgeon under the prescribing cascade.’ (The Royal College of Veterinary Surgeons)*

Accommodation

- *‘Within the actual regulations extract –(c) see other pigs, except- (i) where the pig is isolated for veterinary reasons; or (ii) in the week before the expected farrowing time and during farrowing, when sows and gilts may be kept out of sight of other pigs; 14. Since these Codes are to be applicable to all keepers of pigs, there needs to be guidance to pet pig keepers about the keeping of single pet pigs as can commonly be the case – the regulation as it stands does not allow this.’ (British Veterinary Association)*
- *‘At paragraph 73 we would recommend the following small change in wording to ensure that the value of veterinary advice in terms of advising on appropriate accommodation is clearly articulated and opportunities to safeguard animal welfare are seized: ‘Owner/keepers should seek appropriate welfare advice from a veterinary surgeon and technical advisor when new facilities are to be constructed or existing facilities are modified.’ (British Veterinary Association)*

Enrichment

- *‘The new material on enrichment is a very positive addition and we urge that this is not diluted. The paragraph on objects such as footballs and chains is very helpful in outlining that certain objects should not be used alone as a means of enrichment. The table in paragraph 83 showing which objects are optimal, sub-optimal and of marginal interest is extremely clear and helpful to producers. It is based on many years of peer-reviewed research and practical experience and should remain in the Code.’ (Compassion in World Farming)*
- *‘Para 84: This paragraph is very helpful in outlining that enrichment needs to sustain interest. In the sentence: “should always be available and in sufficient quantity to allow all pigs the opportunity to interact” it would be helpful to add the words ‘without competition’ at the end. This is to avoid an interpretation that this means all pigs can interact with the enrichment at some point, and to make it clear that all pigs should be able to do so simultaneously if desired. In wild or outdoor-farming situations, pigs forage extensively and often all at the same time. Given that enrichment material in indoor systems is to enable natural foraging behaviour, it should be provided in sufficient quantities to allow all pigs to use it simultaneously.’ (Compassion in World Farming)*

Tail docking

Paragraph 128: Where it is necessary to tail dock, it must be carried out in accordance with the law by a competent, trained operator before the seventh day of life, or by a veterinary surgeon. It is important that all equipment used should be cleaned and disinfected between litters of pigs.

- *'We recommend adding 'after the seventh day of life' immediately after 'surgeon' at the end of the first sentence.'* (The Royal College of Veterinary Surgeons)
- *'Although tail-docking is discouraged in the draft code, factory farms commonly perform it routinely instead of offering adequate substrate and enrichment. Used as a money-saving tool, tail-docking may cause pigs to develop neuromas – nerve damage in the tail stump – leaving them in constant pain.'* (People for the Ethical Treatment of Animals)

Managing and reducing the risk of tail biting

- *'The new sections regarding how to avoid tail docking are extremely positive and greatly welcomed and we urge that these are not diluted.'* (Compassion in World Farming)
- *'The frustration and stress of extreme confinement can drive [Pigs] to engage in aggressive behaviour such as tail-biting. As a result, farmers cut off their tails and grind down their sensitive teeth, usually without painkillers – even though UK law prohibits the routine performance of these mutilations.... Wales must follow the lead of countries such as Norway, Sweden, and Switzerland and ban confinement systems of all kinds – including farrowing crates.'* (People for the Ethical Treatment of Animals)
- *'We strongly support recommendations for owners and keepers to work collaboratively with their veterinary surgeon to produce Farm Health and Welfare plans, carry out routine animal-based measures to monitor welfare and identify strategies to prevent and manage tail biting. We believe that the management and prevention of tail biting, which is a complex and multifactorial problem, are essential goals, given their impacts on animal health and welfare and the reputation of the pig farming industry. We are supportive of the information included in the code, and pleased to note that environmental enrichment is not being portrayed as a panacea, nor have environmental adjustments been identified as consistently or universally successful.'* (British Veterinary Association)

Teeth clipping/grinding

- *'Large litters are a root cause for multiple health and welfare problems including injuries to piglets' faces and sows' udders. Teeth clipping is a mutilation employed to minimise this damage. We feel strongly that more detailed information on the effects of large litters should be given to help producers avoid many health and welfare problems, including how to comply with the legal ban on routine teeth clipping or grinding.'*

Paragraph 148 mentions that injuries to teats are reduced if extremely large litters are avoided, but it would be helpful if further detail on what constitutes 'extremely large' is given, in order to reduce ambiguity.' (Compassion in World Farming)

- Compassion in World Farming provided a summary of research on litter size.
- *'Some suggested altered wording for para 148: "...Injuries are reduced if sows are lactating well and do not have extremely large litters (above approximately 12 piglets). Cross fostering piglets from very large litters may help avoid injuries but can*

cause additional welfare problems for the nurse sow and piglets and therefore should not be seen as an alternative for breeding for responsible litter sizes. Sows genetically selected for excessive litter size should not be used. The number of piglets should not exceed the number of functional teats. Avoiding extremely large litters is shown to reduce piglet mortality, increase piglet weaning weights, reduce variability in piglet weights, and reduce the need for farrowing crates, cross fostering and teeth reduction". (Compassion in World Farming)

- *'Tooth reduction must only be carried out upon the recommendation of a veterinary surgeon.'* (The Royal College of Veterinary Surgeons)
- *'As a result [of biting due to extreme confinement], farmers...grind down their sensitive teeth, usually without painkillers – even though UK law prohibits the routine performance of these mutilations.'* (People for the Ethical Treatment of Animals)

Castration

Paragraph 151: Owners/keepers should consider carefully whether surgical castration is necessary. Castration is a mutilation and should be avoided wherever possible. It is also advisable that analgesia is used where pigs less than 7 days old are castrated, not just where pigs are 7 days of age or older. Alternative methods to surgical castration are available which can prevent "boar taint" developing in the meat of heavier boars, such as use of a vaccine.

- *'We too recommend that anaesthetic is used for all piglets and thus castration consequently being reserved for veterinary surgeons only, even where the Regulations permit a farmer/owner to castrate piglets under 7 days old.'* (The Royal College of Veterinary Surgeons)
- *'We strongly agree that mutilations should only be carried out having sought appropriate advice on possible alternative interventions in each case and not as a routine practice. The code should also reference that they should only be carried out to improve the welfare of pigs and that they must be undertaken by a trained and competent person.'* (British Veterinary Association)

Section 2 – Additional specific recommendations

Farrowing sows and piglets

- *'The sentence that 'the aim is for farrowing crates to no longer be necessary' is a very positive step in terms of progress in pig welfare and this should not be diluted. The evidence that farrowing crates severely impair sow welfare is well established and accepted; furthermore a range of commercially proven free farrowing systems now exist that protect both sow and piglet welfare, whilst also achieving equal, or lower, piglet mortality rates compared with crates. Indeed, free farrowing systems designed and produced in Britain are successfully being used commercially in the UK, Ireland, Spain, USA, Australia and South Korea. Please see briefing by CIWF for more detail.'* (Compassion in World Farming)
- *'A couple of weeks before they give birth, mother pigs are commonly confined to farrowing crates so small that they can't even turn around – let alone fulfil their strong*

urge to build a nest – causing them severe discomfort and distress... Wales must follow the lead of countries such as Norway, Sweden, and Switzerland and ban confinement systems of all kinds – including farrowing crates. The Farm Animal Welfare Committee favours the universal use of free-farrowing systems, and although it is impossible to afford pigs all the Five Freedoms while farming them, not subjecting them to intensive confinement would spare them some of the most egregious suffering they currently endure.’ (People for the Ethical Treatment of Animals)

Boars

- *‘As applies to other pigs within the Code, we suggest adding a paragraph to advise that: “Boars must be given a sufficient quantity of bulky or high fibre food as well as high-energy food to satisfy their hunger and need to chew. As with all pigs, effective enrichment material must be provided to boars.”’ (Compassion in World Farming)*

Pigs kept in outdoor husbandry systems

- *‘I would like to add to the code in respect to accommodation of pigs in outdoor husbandry.*

The concerns already expressed for ventilation and coolness have not been defined as applying to hot sunny weather. Although avoidance of frost has been mentioned a definition of the type of structure (besides flooring) has not been adequately defined for use during freezing winter conditions. More definition for the protective structure for outdoor pigs and piglets needs to be given. This should be a windproof and rain proof shelter without gaps that let in icy weather as easily as sunshine. It should also have bedding to enable keeping warm and dry in winter weather.

I say this as pallets are unsuitable for providing accommodation in wet, very cold and windy conditions but too often used for 3 sides of a to open structure. Specifically knocking together pallets should be against the code unless slat gaps are filled adequately.’ (Anonymous)

Additional comments

Unannounced inspections

- *‘Authorities must also monitor conditions on farms via regular unannounced inspections and take stringent action against any facilities that fail to comply with welfare guidelines, including by seeking the prosecution of the workers involved. Currently, the inspections carried out by farm assurance schemes and government bodies are pitiful. They are very rarely, if ever, unannounced, so inspectors do not see a true representation of the routine welfare abuse and law-breaking taking place on farms all over the country.’ (People for the Ethical Treatment of Animals)*
- *Less than 1% of Red Tractor inspections are unannounced, and a 30-minute warning is given even for these. The RSPCA inspects ""RSPCA Assured"" farms once a year, and a minimum of just 30% of farms get a further unannounced inspection. It should not be down to animal protection organisations to do the job of these agencies. It is commendable that the Welsh government wants to update its code of practice for pigs, but it must ensure that inspections to enforce these standards are regular, unannounced, and thorough. Those who are ignorant or neglectful of legislation on*

the protection of the animals they raise must be subject to harsh penalties, and anyone abusing animals must receive a custodial sentence.’ (People for the Ethical Treatment of Animals)

Wild boar

- *‘We would recommend that the draft code also considers the farming and keeping of wild boar. In many cases, wild boar are shot on farm in an approved farm slaughter facility before being transported to an approved slaughterhouse. These processes result in additional handling risks and potential for escapes that could result in the development of feral populations. The draft code would present an opportunity to recognise and address these risks.’ (British Veterinary Association)*

Dissemination of the new code

- *‘Welsh Government should work collaboratively with the professional and representative organisations of the stakeholders outlined at the start of this consultation to promote the code across their various communications channels, aiming to reach keepers and owners directly and those that work closely with these groups to ensure the high welfare of the pigs under their care. Further, consideration should be given to extracting certain sections of the Code of Practice, e.g. strategies for identifying, managing and preventing tail biting and the table on suitability of materials for providing enrichment and how this information could be meaningfully presented as quick reference resources to facilitate compliance from owners and keepers. In addition, thought should be given as to how to reach owners who keep pigs as pets with the messaging and best practice that is set out in the draft code’.* (British Veterinary Association)

2.2 Question 2: We would like to know your views on the effects that The Code of Practice for the Welfare of Pigs would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?

Only the British Veterinary Association (BVA) answered this question. BVA noted in their response the importance of having all guidance and accompanying documentation on this matter available bilingually:

- *“BVA is aware of the Welsh language act and the importance of the Welsh language in Welsh communities, particularly in rural areas likely to be most affected by agricultural policy. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication and it is important for animal health and welfare that farmers in all parts of Wales are able to access information and guidance in their chosen first language.” (British Veterinary Association)*

2.3 Question 3: Please also explain how you believe the proposed policy The Code of Practice for the Welfare of Pigs could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities

for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No respondents answered this question.

2.4 Question 4: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Respondents identified formatting errors in the revised Code.

Other responses to this question have been included in the summary of the responses to Question 1, where they best fit.

3. Next Steps

All comments on, and responses to, the consultation have been analysed. Comments and suggested amendments will, where appropriate, be incorporated in to the Code. The updated Code will be reviewed by the Animal Welfare Committee (AWC) which advises the Department for Environment, Food and Rural Affairs (Defra) and the Scottish and Welsh Governments on the welfare of animals.

A final draft of the Code will be laid before the Senedd for 40 days. If within the 40 day period, the Senedd does not resolve to annul the draft, the Minister for Environment, Energy and Rural Affairs will issue the Code in the form of the draft laid before the Senedd.

Annex A - List of organisation which responded to the consultation

British Veterinary Association (BVA)

Compassion in World Farming (CIWF)

People for the Ethical Treatment of Animals Foundation (PETA)

Royal College of Veterinary Surgeons (RCVS)

Plus one Anonymous response