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Dear Debbie,

Red Tractor assured Proposed New Standards – October 2021

Following consultation with its membership, please find below a response from the Farmers' Union of Wales to the above consultation.

General Comments

Members recognised the current reputational issues facing the sector and agreed that mitigating such issues was a priority for the sector. However, the lack of any suitable outlet for male bull calves – coupled with the imperfection inherent in current technologies - has led many FUW members to comment that there must be a degree of pragmatism and prudence regarding what can be achieved by primary producers acting as a single payer in the entire supply chain.

Indeed, FUW members commented that success on this issue would require commitment from other key players in the supply chain; such as semen companies, processors and buyers. For example, sexed semen as a viable alternative means of controlling male calf numbers has a maximum 80 percent success rate and future policies on this issue must therefore recognise the current technological limitations facing producers. Advances in this field would aid primary producers in meeting the aspirations of this consultation. Within this context, some FUW members suggested that sexing all AI bull semen would offer producers a more accurate breeding policy and would allow producers to make choices that meet all of their breeding criteria rather than just those which were currently sexed.

When considering outlets for bull calves, members also suggested that buyers had a responsibility to help develop a legitimate and authentic market place for such calves as they were an inevitable by-product of milk production. Development of such a market is out with the control of the vast majority of primary producers and it is therefore essential that moves towards the cessation of routine euthanasia of bull calves is done in conjunction with the sincere development of appropriate markets for these animals. This is especially pertinent given that policy development in this area continues to speed ahead of the technology available to primary producers and despite a dearth of markets. Sales of calves to markets must be an inherent part of policy discussions in this area. Several members suggested that greater efforts to find suitable veal markets would be welcomed.

The FUW notes the requirement for a provision / plan for a TB breakdown. Whilst members understand and agree with the importance of planning for a TB breakdown, the unpredictable and evolving nature of a breakdown will require any plans put in place to be both flexible and adaptable at short notice. It is imperative that producers are not detrimentally affected if these plans need to be significantly altered to cope with a breakdown.

Specific Consultation Questions

Question 2: *The dairy industry has committed to rearing all calves with care and eliminate the euthanasia of calves by 2023. How important do you think this issue is to the reputation of the dairy industry?*

When considering reputational protection, members responding to this section of the consultation believed that eliminating the euthanasia of bull calves was either the most important priority or a top priority facing the industry.

Question 3. *A written breeding and management policy implemented on farm is necessary to demonstrate that there is no routine euthanasia of calves. Do you already have such a policy which covers the management processes detailed in the proposed new standard.*

Whilst this question is more suited to individual responses, the FUW will use this opportunity to state that many milk buyers already require additional information about calf rearing policies and mortality rates from producers. Any future additional requirements under RTA standards must not function to duplicate this work.

Question 4. *Calf mortality is already measured in the annual vet review. The proposed new standard seeks to improve the data collected at the assessment visit. Do you already make use of industry tools which provide data to help you make more informed decisions?*

Some FUW members were unclear about the industry tools referred to in this question and the FUW would therefore suggest that more knowledge transfer and information dissemination is needed to arm producers with all of the resources available to them. The FUW would welcome further discussions on this point and would welcome engagement with RTA on this issue.

Some members commented that the use of stock bulls would inevitably raise issues and that a suitable plan would need to be in place to deal with the resulting bull calves. Increased knowledge exchange and better signposting to the tools available would aid producers.

Question 5. *Taking the production cycle into consideration. What is your opinion on the 2023 timeline?*

In general, members believed the 2023 timeline to be appropriate. However, several members commented that some primary producers would struggle to afford the costs associated with the provision of additional suitable livestock housing. Indeed, these potential additional costs will likely be coupled with those future costs pertaining to the implementation of pan-Wales agri-pollution regulations and businesses may struggle to fund all of the investments required.

Question 7. *The new standard requires Red Tractor dairy scheme members to have a written breeding and management policy. Measurement of this standard is outcome based so as to ensure that the policy is actively being implemented on farm. Do you agree that this is the most effective way to deliver the industry agreed commitment?*

Members responding to this section of the consultation believed that this was appropriate.

Question 8. *Calf mortality is already measured in the annual vet review. The proposed new standard seeks to improve the data collected at the assessment visit in order to improve the national picture. How valuable do you think it is to have this data requirement as a stand-alone standard?*

Members' responses to this section of the consultation were varied. Several members commented that this stand-alone standard would be valuable. However, other members commented that calf mortality was not a synonym for euthanasia and queried the inclusion of this question and the value of mortality as a stand-alone figure.

Notwithstanding the above, any moves to increase mortality data provision must also account for – and distinguish between - animals removed as part of a TB breakdown and other mortality statistics.

I trust due consideration will be given to the preceding information.

Yours faithfully

Hazel Wright