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Red Tractor 2021 Standards Review FUW Response

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About the Farmers' Union of Wales

The FUW was established in 1955 to protect and advance the interests of Welsh families which derive an income from agriculture.

The FUW's vision is thriving, sustainable, family farms in Wales, while the mission of the union is to advance and protect Wales' family farms, both nationally and individually, in order to fulfil the Union's vision.

In addition to its Head Office, which has thirty full-time members of staff, the FUW Group has around 80 members of staff based in twelve regional offices around Wales providing a broad range of services for members.

The FUW is a democratic organisation, with policies being formulated following consultation with its twelve County Executive Committees and eleven Standing Committees.

General comments

Given that the vast majority of FUW members with land or farms in England or subject directly to Red Tractor Assured Farm Standards are sheep, beef and dairy producers, only the proposals to review the standards across these sectors have been considered.

Members of the FUW believed that the proposals set out to review the standards of the beef & lamb and dairy Red Tractor assurance schemes have been drafted solely for the benefit of Red Tractor without considering the practical and cost implications (see Cost implications below) of this review on Red Tractor assured producers in different geographic areas.

In particular, a 'one size fits all' approach towards assurance schemes for different sectors will not work given that beef & lamb producers cannot be expected to complete audits similar to what is required of assured pork and poultry producers. As an example, sheep are commonly treated and recorded on a batch basis, the numbers are large, animals are commonly kept on large extensive areas of land and not passing through handling facilities on anything like a daily basis (as is the case for dairy cattle), and therefore a requirement for sheep farmers to record all lame livestock as is required by dairy producers would be impractical.

In addition, members opposed the introduction of a number of new standards due to the added burden on paperwork, bureaucracy and farm inspections while taking into account the fact that many Red Tractor assured producers already comply with cross compliance requirements and further, the risk of a 'National Minimum Standards' baseline as is being proposed in the Welsh Government's Agriculture White Paper.

Many producers commented that they regarded the Red Tractor assurance scheme as having become monopolistic as numerous processors have adopted Red Tractor standards as a compulsory requirement for producers to comply with as part of their contract. These

producers have very little breathing space and will have no choice but to adhere to new Red Tractor assurance scheme standards in future.

As you will be aware, the overwhelming majority of Welsh sheep and beef farmers who are part of an assurance scheme are Farmed Assured Welsh Livestock (FAWL) members, and not Red Tractor assured. Members felt concerned that Red Tractor assumes that its standards and assurance schemes represent an overarching example across the UK, despite the fact that devolved schemes including FAWL and Quality Welsh Food Certification (QWFC) in Wales, Quality Meat Scotland (QMS) - Cattle & Sheep Assurance Scheme in Scotland and The Northern Ireland Beef & Lamb Farm Quality Assurance Scheme (NIBL FQAS) are available. Moreover, they felt concerned that such a perception could lead to unrealistic and disproportionate standards being forced on other assurance schemes by buyers, despite many standards being inappropriate and impractical in areas such as Wales.

Cost implications

FUW members expressed particular concerns in regard to the cost implications of introducing these new standards on Red Tractor assured farms given that farmers with land in Wales will soon be faced with huge bills for upgrading their slurry stores to comply with the incoming Water Resources (Control of Agricultural Pollution) (Wales) Regulations and cuts to Basic Payment Scheme (BPS) payments from 2024 onwards.

Farm assurance schemes are claimed to be used by processors and supermarkets to promote and market products at premium prices, however, dairy producers in particular who have no option but to comply with Red Tractor standards as part of their contract do not receive any additional payments for being compliant, and therefore the farm business must absorb any extra costs associated with the introduction of higher standards.

Beef and lamb producers can decide whether or not being part of a farm assurance scheme would provide a financial benefit to the farm business, however, it was felt that Red Tractor assured farmers should receive a guaranteed premium for their produce in line with the benefits associated with farm assured products rather than focussing entirely on demand from major retailers.

As such, FUW members requested a copy of any risk/financial assessment that had been undertaken to consider the implications and costs to producers, and queried whether additional costs would be proportionate to the additional value of the products - if any such additional value can be realised.

Beef & lamb and dairy (where applicable) proposals

The comments below should be considered in the context of beef and lamb producers. However, comments raised by FUW members from a dairy perspective in response to proposals to change standards for beef & lamb and dairy producers are clearly noted.

Vermin Control

VC.1 - Many dairy producers are already required to complete a site survey every quarter under dairy assurance schemes. However, some believe that this proposed change has derived from the pig and poultry sectors and is therefore disproportionate.

Housing, Shelter & Handling Facilities

HF.6.1 - FUW members felt strongly that tethering should not be prohibited given that it is an essential livestock management tool for administering medicines and the safest way to house cattle for the safety of the stock and farmers.

Members in Merionethshire raised particular concern in regard to many farm buildings and cattle handling facilities having been constructed simply for the purpose of tethering.

The FUW would wish to request evidence from Red Tractor which suggests that tethering represents a particular animal welfare issue or health and safety risk.

HF.10 - Members believe that the proposed ramp angles are irrelevant given that sheep and cattle are presented with variations of ramp angles when grazing.

HF.11.c - The requirement to provide livestock with shaded areas will represent a major problem for many producers across Wales, particularly for those who have been required to exclude stock from woodland areas to meet the criteria of agri-environment schemes and in coastal regions where there are very few naturally shaded areas available, and trees and hedges, when planted, often struggle to survive due to weather conditions.

Furthermore, more efficient farming practices such as paddock or strip grazing and out-wintering cattle on root crops have been strongly encouraged over the past decade for keeping costs down and enhancing business resilience. In many cases, fields are split up into paddocks according to stock numbers and grazing area and therefore lack naturally shaded areas, and producers will be looking towards out-wintering cattle more often once the Water Resources (Control of Agricultural Pollution) (Wales) Regulations are implemented in order to reduce slurry volumes.

FUW members therefore had major concerns regarding the viability of this proposal and its cost/efficiency implications, and felt that more detailed information was required as to what would constitute sufficient shade and be deemed as acceptable if this proposal was taken forward.

Feed & Water

FW.1.1 - Many producers already have a current colostrum policy in place.

FW.1.2 - Members felt that this proposal was condescending to experienced livestock producers given that farmers should be free to seek advice from a nutritionist as and when required rather than it being made a compulsory requirement under Red Tractor assurance and that such a requirement would impose unnecessary costs.

FW.4.e - Producers in the Counties of Anglesey and Caernarfonshire provided examples whereby injurious weeds such as ragwort had spread onto agricultural land from National Nature Reserves (NNRs) or Local Authority owned land and strongly believed that it would be unfair to punish farmers when those responsible do not control the spread of such weeds, in spite of their obligations under the 1947 Agriculture Act.

Animal Health & Welfare

AH.1.c - Many farms use different contractors for various animal management procedures each year, and therefore this standard would create additional unnecessary paperwork.

AH.3 - Under current FAWL requirements, an annual review is only required for medicine usage. It may not be possible for a vet to visit the farm and undertake a livestock health and performance review to include medicine administration and collation records annually given ongoing pressures on vets for Bovine TB testing, Export Health Certificates (EHCs) for exporting products to the EU and Covid-19 restrictions.

AH.3.1 - The voluntary Gwaredu BVD programme is currently the Welsh equivalent of BVDFree England, although it is looking likely that compulsory BVD testing will be introduced as legislation across Wales in the near future. As a result, it is imperative that Red Tractor recognises that BVD eradication schemes differ between the devolved nations and that Red Tractor assured producers are not expected to comply with policies from other nations as part of their contracts with processors and/or retailers.

Animal Medicines

AM.3.1 - FUW members agreed that all personnel are required to be competent and should receive training where appropriate, as is stated under current FAWL regulations given that training comes with practice.

Concerns were also expressed surrounding the cost and time implications of introducing new standards that require compulsory training and the possibility of being unable to administer medicines in compliance with Red Tractor standards if the trained individual is not available. As a result, members believed that this requirement for training should be discussed on a per farm basis with the vet.

AM.7.c - Members in Carmarthenshire in particular questioned why this standard is being proposed given that neither devolved Governments nor consumers have requested for such data to be made available.

AM.9.a - Members believed that Red Tractor must recognise that HP-CIA antibiotics cannot be bought by the producer and that they can only be prescribed by the vet. Many questioned whether vets would have the time to undertake sensitivity and diagnostic tests routinely amidst their busy schedules.

Husbandry Procedures

HP.1 - Restricting Red Tractor assured producers to carry out husbandry procedures that are listed in the health plan does not allow for the flexibility required to run a farm business in response to disease outbreaks for example.

HP1.1 - Members queried how Red Tractor will expect its producers to provide effective pain relief when cauterising horns that takes place over a period of time without using paste.

Livestock Transport

LT.4.b - This standard was raised as a concern by those adopting early lambing flocks and winter shearing.

The Medicine Hub proposals

FUW members expressed a number of concerns in relation to the proposals to make it a compulsory requirement for Red Tractor assured producers to upload medicine use information onto the AHDB Medicine Hub.

It is recognised that livestock producers have a major role to play in reducing the use of antibiotics and that having a central database to collate the information on antibiotic use makes sense. However, the majority of farmers are already required to record such data through other farm assurance schemes.

In order to comply with farm assurance in general, the farm must have a herd health plan produced by the vet to include medicine use data which should be adequate for demonstrating that antibiotic use targets are being met. Furthermore, some members already collate this data through their vet for research conducted by Nottingham University and dairy producers are required to do so as part of Dunbia contracts.

Therefore, it is essential that if Red Tractor decides to implement this as a compulsory requirement for assured producers, the AHDB Medicine Hub must be able to work in conjunction with other recording systems in order to prevent the duplication of data. It is understood that AHDB are already in discussion with Welsh Government and Welsh Lamb & Beef Producers (WLBP) to address this issue.

It was also questioned whether or not vets would be able to upload information on behalf of a producer if they are unable to do so due to poor rural broadband for example.

Given the above and the fact that Red Tractor recognises that the AHDB Medicine Hub is still in development, the members felt strongly that these proposals should be stalled until the hub has been finalised and solutions found on farms with poor broadband and IT skills.

Environmental protection (beef & lamb and dairy) proposals

The Red Tractor website states that *“Red Tractor was established 20 years ago to reassure consumers that food bearing its logo was safe and responsibly produced.”* Therefore members were strongly against the proposals to introduce a number of new standards in relation to environmental protection.

Welsh Government requirements to keep agricultural land in Good Agricultural and Environmental Condition (GAECs) already govern good farming practices for protecting the environment, and so members felt that these standards do not fit within the remit of Red Tractor when there are others better placed to police such compliance.

It is disappointing to note that these proposals have been set out in line with Defra’s Farming Rules for Water guidance which will fit together with the future Environment Land Management Scheme (ELMS) in England. Red Tractor must recognise that future agricultural policies will differ across devolved nations and that a ‘one size fits all’ approach towards standards for Red Tractor assured producers across the UK will not work. In addition, the new Water Resources (Control of Agricultural Pollution) (Wales) Regulations will impose NVZ restrictions across the whole of Wales therefore Red Tractor should not be responsible for governing such standards.

EC3.1 - Although members recognise the importance of avoiding poaching and soil erosion, producers and spring calving herds in particular should not be penalised if farm inspections are undertaken during adverse weather conditions.

EC.8 - EC.10 - Members felt that these proposed measures are already being adopted on farms and constituted good practice.

EC.23 - If Red Tractor decides to take this standard forward, more information would be required explaining what would need to be done to evident compliance.

Personnel (beef & lamb and dairy) proposals

Given the reasons why Red Tractor was set up, as stated above, members also felt that the proposals to introduce new standards on the welfare of agricultural employees are inappropriate. Employers already have a duty to provide training and the appropriate facilities

to employees under employer paid liability, therefore there is no need for Red Tractor to introduce such requirements into farm assurance standards.

PL.6 - The requirements to provide appropriate on site accommodation are already lawfully enforced on all producers and should not be inset within Red Tractor assurance standards as they don't relate directly to the production of safe food.

Introducing such standards to farm assurance schemes will discredit the purpose of production standards and incur additional costs and bureaucracy across the industry whereby our domestic market competitors will not be faced with such requirements.

PL.7 - Red Tractor must realise that introducing the requirements to communicate a grievance procedure to employees will not necessarily address or prevent these issues from arising.

PL.9 - Members highlighted that all employees are responsible for health and safety.

PL.12 - Whilst members thought that it was always sensible for an individual on-farm to have first aid training, they felt that the proposed standard was excessive as many small scale farms are run by one individual. Members therefore suggested that this proposal, if taken forward, should be introduced as a recommendation rather than a compulsory requirement for those who don't employ workers.