



FAWC, Area 5a, 9 Millbank, c/o Nobel House
17 Smith Square, London, SW1P 3JR
Tel: 020 7238 5192 Fax: 020 7238 6113

Richard Lochhead MSP,
Cabinet Secretary for Rural Affairs,
Scottish Government
Pentland House
47 Robb's Loan
EDINBURGH
EH14 1TY

7th July 2008

Dear Mr Lochhead,

Welfare of pigs in Scotland

Following our meeting on 15th April 2008, FAWC has now considered the questions you raised in relation to the welfare of Scottish pigs and of pigs reared abroad that produce pig meat, e.g. pork, sausage and ham, for sale in Scotland and the other home countries.

It has proved difficult to distinguish between Scottish pigs and those produced elsewhere in the U.K., since there is considerable movement of both live animals and products between the home countries. In general, we have therefore answered your questions for the U.K. or Great Britain, but have commented on the Scottish situation where such information is available.

The U.K. pig industry and imported pig meat

The most recent data on number of breeding pigs for 2007 are 379,000 in England and Wales, 37,000 in Northern Ireland and 40,000 in Scotland. The U.K. as a whole showed a 2.7% reduction in the number of breeding animals from 2006, whilst Scotland showed a 4.8% reduction. This continues a long term trend which has seen the U.K. herd fall substantially by 52% since 1997.

U.K. self-sufficiency in pig meat has fallen from 84% in 1998, to an all time low of 50% in 2006. The total volume of pig meat imports in 2006 was 872,183 tonnes, an increase of 5.5% from the previous year and of 37% since 2001. Denmark, the Netherlands and Germany are the main suppliers to the U.K, but there are also imports from other European countries, e.g. France, Belgium, Ireland and Spain.

Comparison of British welfare standards for pigs with those of other countries that export to the U.K.

Legislation

Within the EU there is a common baseline for pig welfare standards set by Council Directives 91/630/EEC and 2001/88/EC, and Commission Directive 2001/93/EC. All countries outside the EU that export to the U.K., such as the United States, currently have no legislation that is specific for pigs.

Within the EU, some countries have implemented legislation in addition to the EU baseline, and this has been the case for the U.K. The specific points of difference between the U.K. and the EU baseline are as follows:

1. The U.K. has had a complete ban on close confinement in individual stalls for non-lactating sows since 1st Jan 1999. Most other countries continue to use stalls, and can do so until 2013 by which time they must have been phased out in the EU. An exception to this is Sweden, where stalls are also no longer permitted, but imports to the U.K. from Sweden are small (<1%). The Netherlands adopted an intermediate date of 2008 to end the use of stall systems throughout pregnancy.
2. The U.K. does not allow stalls at any stage for non-lactating sows, whereas most other countries will continue to allow stalls for a period of 4 weeks after weaning beyond 2013, as permitted under current Directives.

Voluntary measures

More than 90% of U.K. pig meat is produced under the auspices of farm assurance schemes, e.g. the Quality Meat Scotland scheme, and its English equivalents run by Assured British Pigs and Genesis Quality Assurance. These schemes have defined written welfare standards which are audited by independent annual inspection and quarterly visits from a veterinary surgeon. Relevant points are:

1. No large-scale farm assurance schemes of this nature exist in other countries, although there is a range of small niche schemes in the U.K. and elsewhere. Whilst large scale industry schemes do operate in other European countries, for example the QSG scheme in Denmark, IKB scheme in the Netherlands and QS scheme in Germany, these focus predominantly on food safety rather than animal welfare issues and in some cases have a lower frequency of audit. The U.K. pig industry therefore has more rigorous inspection of compliance with animal welfare legislation and good practice than any other country.
2. The requirement for quarterly veterinary visits at which welfare is inspected is unique to the U.K. Whilst Denmark requires monthly veterinary visits, these are to assess compliance with the regulations governing the prescription of medicines, and do not involve an assessment of welfare.
3. Male piglets are not allowed to be castrated in a farm-assured herd in the U.K. Castration without anaesthesia is currently the norm in all other EU countries (and major pig producing countries outside the EU). A recent EU survey (2007) carried out as part of the Framework VI "PIGCAS" project confirmed that castration in these countries is done without anaesthesia and often with tearing of tissues in contravention of current Directives.
4. A high proportion of U.K. herds also require regular health monitoring through abattoir inspection schemes run by Wholesome Pigs Scotland and the British Pig Health Scheme. Few other countries operate such detailed inspection and feedback procedures, although Sweden is again an exception.

A number of European countries have developed commercial contracts specifically to supply products for the U.K. market. Although these contracts specify production of pigs to U.K. minimum legal standards, they still permit castration. Using the number of such herds and the volume of imported product, BPEX (2006) suggest that the great majority (70%) of pigs for export to the U.K. did not meet U.K. minimum legal standards.

Production systems

The U.K. has a higher proportion of extensive production systems than found in other European and non-European countries. In the U.K., BPEX estimates that 40% of sows are managed in outdoor systems, and that the great majority of sows have access to straw bedding. It is also estimated that 65% of finishing pigs have some degree of straw bedding. It has not been possible to obtain comparable data for Scotland alone. A survey carried out in 1999 indicated that no other EU country had more than 10% of finishing pigs in systems with straw. The availability of straw, or other similar alternative, has been shown in many studies to be important for appropriate expression of exploratory and foraging motivation, which is of particular significance for the dry sow fed a regulated diet. Straw bedding may also reduce the prevalence of foot and leg ill health. Exporting countries (to the U.K.) keep the great majority of their pigs in un-bedded, slatted systems. Whilst the nature of the

production system is of less importance than the quality of management and stockmanship in determining pig welfare, the more extensive systems used in the U.K. allow greater possibility for the satisfaction of behavioural needs.

Outcome assessment of pig welfare

Welfare should be assessed by a combination of resource inputs and welfare outcomes and British scientists and farmers are pioneering such schemes. Assessment of welfare outcomes is a recent development and there are not yet international surveys that would permit an objective comparison between countries. The only published data relate to mortality in herds which has been recorded in databases for national analysis. These herds may not be representative of average performance in many countries.

Data published by the InterPIG group indicate a significantly higher sow mortality rate of 14% in Denmark, compared with other EU-recorded countries including Great Britain (6%). The replacement rate of breeding animals is also higher in Denmark (50.4% versus 43.8%), suggesting that this cannot be simply attributed to a difference in disposal strategies for cull animals. The mortality of suckling piglets and growing pigs does not currently differ markedly between the EU countries where such data are recorded.

In the future, objective welfare outcome data may become available through a standardized assessment scheme currently under development in the Framework VI project "Welfare Quality". This would provide a much sounder basis for an international comparison of welfare between countries.

The cost of production in the U.K. and exporting countries

The U.K. has a higher cost of production than most other countries within the EU. InterPIG standardised cost of production figures for 2006 showed the cost of production was 12% higher in Britain than the EU average, and more than 60% higher than in North and South American exporting countries. World Trade Organisation rules are generally interpreted as precluding any trade restrictions on the basis of animal welfare standards in the country of origin, placing the EU in general and Britain in particular at a significant competitive disadvantage.

It is difficult to ascribe increased cost of production to specific welfare measures within the U.K., since other costs such as feed, land and labour also differ considerably between countries. However, the requirement to phase out sow stalls in advance of the rest of Europe imposed a significant cost penalty on U.K. producers for premature rebuilding or refurbishment. This often involved a change from a slurry-based to a straw-based system, requiring new manure handling systems, manure stores, machinery and clear span buildings. The capital costs of the feeding systems and buildings alone were estimated at the time of transition to range from £400 to 700 per sow place, a substantial cost in terms of profitability. The ban on sow stalls and the use of straw have imposed significant additional costs on U.K. pig farmers, who have generally not been rewarded for their efforts in the market place.

Conclusions

The majority of pigs in the U.K., including those in Scotland, are kept to a higher welfare standard than elsewhere in the EU and other countries. The higher standard arises from differences in legislation and voluntary measures but both will have increased the costs of pig production in the U.K. relative to those in exporting countries.

While it is true that importers of pig meat into the U.K. could demand in their purchasing specifications that suppliers meet U.K standards, this can only be voluntary and whether importers insist on such a requirement will be determined, in part, by market forces. Other members of the food chain, particularly retailers, can play a major role by offering products of different welfare standards and origin, thereby catering for consumer choice. However, if pig meat is not labelled according to its welfare provenance, then concerned consumers will not be able to exercise their choice and may, unwittingly, purchase products that do not meet their requirements.

The arguments for welfare labelling of animal products were made in the FAWC report (June 2006) and the possible introduction of a European labelling scheme is under active consideration by the Commission at present.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. M. Wathes', written in a cursive style.

Professor C. M. Wathes
Chairman

cc to Ministers in England and Wales; CVOs