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Dear Minister,

The welfare requirements for sheep in Great Britain, New Zealand and Australia

1. Following your request of January 2009, FAWC has considered requirements for the welfare of sheep applicable to the sheep industries in Great Britain and the main countries that export lamb to Great Britain.
2. Official statistics (Agriculture in the United Kingdom, 2009) show that the UK is the largest sheep meat producer in the EU27, producing about 30% of EU sheep meat. In 2009, there were about 15 million breeding ewes and 16 million lambs in the UK with an average flock size of 211 breeding ewes.
3. The UK is nearly 90% self-sufficient in sheep meat and has a natural marketing window from late May until early February. The shortfall is made up by imports, mostly from New Zealand (74%) and the remainder largely from Australia (11%) and Ireland (6%).

Statutory requirements relating to sheep welfare

Legislation in the United Kingdom

4. Much of UK farm animal legislation emanates from the EU. European legislation relating to the welfare of farmed sheep is the Council of Europe Convention for Protection of Farmed Animals (ETS 87 1976), as amended (ETS 193 1992), which was translated into EU law by Directive 98/58/EEC. This and other EU laws make provision for the essential needs of animals in both intensive and extensively farmed systems. They place obligations on animal keepers to comply with and to promote animal welfare and on Competent Authorities to enforce standards through inspection.

5. Commission Regulation 882/2004/EC requires Competent Authorities to undertake Official Controls to check compliance with Community rules and report these checks to the European Commission. In addition to the usual enforcement measures and penalties, a failure of sheep keepers to meet Community rules, including those relating to welfare, can result in a reduction of payments made under various Common Agricultural Policy (CAP) schemes. There are also independent EU checks on Member State compliance through the Food and Veterinary Office.

6. In England and Wales, the welfare of sheep is protected by the [Animal Welfare Act 2006](#) (with similar legislation in Scotland). It is an offence to cause unnecessary suffering or to fail to provide for an animal's needs and there is a duty of care placed on the person responsible for the animal. These general provisions are supplemented by detailed requirements set out in the [Welfare of Farmed Animals Regulations](#) (2007) and Welfare Codes for each country. The Welfare Codes for sheep cover these legal requirements and contains advice for farmers and shepherds on best husbandry practices. The Code incorporates FAWC's advice as well as the detailed provisions of the Council of Europe's recommendation on the welfare of sheep, 1992. Slightly different Welfare Codes are developing in England, Scotland and Wales as responsibilities have devolved.

7. The welfare of sheep is also protected by other European and domestic legislation and guidance covering transport, markets, slaughter and killing, movements, identification, mutilations, veterinary medicines and feedstuffs.

Legislation in New Zealand

8. The Animal Welfare Act 1999 in New Zealand requires all owners and people in charge of animals to meet the physical, health and behavioural needs of their stock. This means providing animals with appropriate food, water and shelter, handling them appropriately, providing them with an opportunity to display normal patterns of behaviour and avoiding or treating injury and disease. These requirements are very similar to those in the UK. The Act does not provide the detail of what these needs are or how they should be met for each species or situation. This detail is given in Codes of Welfare for sheep and is focussed on procedures (e.g. transport or commercial slaughter). These Codes are drawn up by the industry (or others) and approved by Government on the recommendation of the National Animal Welfare Advisory Committee, NAWAC, which is an analogous body to FAWC except it deals with companion, wild and pest animals as well.

9. The minimum standards in the Codes of Welfare must be met to comply with the Act. Breaching a minimum standard is not an offence, but can be used as evidence under the Act (e.g. failing to provide water or food). Equally, if a minimum standard is met, this can be used in a keeper's defence if prosecuted for an offence. A breach of a minimum standard can indicate that someone has committed an offence. The legal status of the Welfare Code in New Zealand is similar to that in GB.

Legislation in Australia

10. Under the federal structure, responsibility for animal welfare legislation resides with the Australian States and Territories rather than the Commonwealth. The Primary Industries Ministerial Council has developed Model Codes of Practice for the Welfare of Animals that contain detailed requirements about animal welfare for livestock throughout Australia. The Model Code for Sheep covers their basic requirements with specific advice about intensive systems, euthanasia and mulesing. A national system of directly enforceable standards for animal welfare in each of the livestock industries is being developed to replace the national Model Codes. The intention is to implement these standards consistently in each State and Territory.

Conclusion about statutory requirements

11. The statutory requirements relating to sheep welfare are broadly similar in Great Britain, New Zealand and Australia. However, there are some mutilations, such as mulesing, that are currently allowed abroad but which are prohibited in UK. In addition in the UK, there is an EU requirement for a system of surveillance and official controls for welfare on farm, during transport and at slaughter to check the implementation of welfare laws.

Assurance schemes in Great Britain, New Zealand and Australia

12. Currently, farm assurance is the food chain's means to gain market access and to give consumers and retailers confidence in food safety. Most sheep meat in Britain (estimated around 65%) is produced under a farm assurance scheme, e.g. Assured Food Standards, Farm Assured Welsh Livestock and Quality Meat Scotland, while UK retailers importing lamb state that regular inspections take place during production. Neither New Zealand nor Australia has a national farm assurance scheme but exporting abattoirs usually adhere to the demands of individual UK retailers and their own commercial assurance standards, owned and controlled by individual companies but not third party audited. Australian lamb is often imported into the UK food service sector but the farm assurance and abattoir requirements are less clear.

Quality of life of sheep in Great Britain, New Zealand and Australia

13. The most reliable evidence about the quality of life of sheep comes from public welfare surveillance. In Britain, public surveillance has been undertaken for many years by Animal Health, local authorities and the Food Standards Agency using established methods. The results are published, e.g. in the Annual Report of the Chief Veterinary Officer, and trends can be identified. Public surveillance is not undertaken on a similar basis in New Zealand and Australia and independent information is not available. Comparison is difficult where data is not available on key indicators of sheep welfare.

14. Some assessment of welfare can be made by consideration of the most common husbandry practices and/or circumstances that can lead to good or poor welfare. However, reliable information for comparison is again scarce.

Good welfare

Adoption of assurance schemes, with standards above the legal minimum
Breeding of sheep that are fit for purpose, e.g. Easycare, lambing ease
Knowledgeable and skilled stockmen and suitable sheep:stockman ratios
Meeting the essential vital needs of sheep
Surveillance of welfare in both private and public schemes

Poor welfare

Any mutilation, especially when performed without anaesthesia and analgesia, e.g. castration, tail docking and mulesing
Certain abattoir practices, such as washing live sheep
Dystocia and prolapses
Lack of care for ewes and lambs
Long-distance transport for slaughter
Untreated disease, e.g. lameness, endoparasites

15. One important indicator of poor welfare is disease. Public surveillance is carried in many countries and the results are collated by the OIE, although quantitative data on the national incidence or prevalence of individual diseases are not published in a form that is so readily accessible.

Conclusions

16. We would expect that imported products ought to meet the minimum welfare standards which prevail in Great Britain, otherwise there is a potential to mislead consumers.

17. Based on the above evidence, and the experience and expertise of its Council, FAWC concludes that:

- The legal requirements in terms of animal welfare are similar in Great Britain, New Zealand and Australia.
- There are some differences between these countries in permitted husbandry practices, e.g. mulesing is currently permitted in Australia, though alternative methods of fly strike control are being investigated.
- It is not possible to compare satisfactorily the welfare of sheep in these countries because of an absence of public surveillance data about welfare.
- Public surveillance and farm assurance schemes in Great Britain continue to provide a framework to protect the welfare of individual sheep in Great Britain.

Yours sincerely,



Professor Christopher Wathes, Chairman

cc CVOs in England, Wales and Scotland;
Ian Strachan, Huw Jones,
Sue Ellis; Liz Kelly;
FAWC members;
FAWC website